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ABSTRACT

The guide is intended for use by staff of governmental agencies that exercise regulatory authority over postsecondary educational institutions. It describes a simplified system for collecting, analyzing, and sharing information on the policies and practices of the regulated institutions. The policies and practices in question are those that relate specifically to preventing potential abuses of students, who are consumers of the services provided by the institutions. The system is designed to operate within the existing tripartite system of determining/maintaining/terminating an institution's eligibility to participate in U.S. Office of Education programs of financial assistance for postsecondary students. These programs include the Guaranteed Student Loan Program, the Basic Educational Opportunity Grants, and the three institution-based programs of College Work Study, Supplemental Educational Opportunity Grants, and National Direct Student Loans. (Author/MSE)

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SYSTEM FOR COLLECTING, ANALYZING, AND SHARING INFORMATION ON INSTITUTIONAL CONSUMER PROTECTION PRACTICES: REGULATORY USER GUIDE

IMPROVING THE CONSUMER PROTECTION FUNCTION IN POSTSECONDARY EDUCATION

Steven M. Jung
David E. Gross
Naomi L. Bloom

20 September 1976

U. S. DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE
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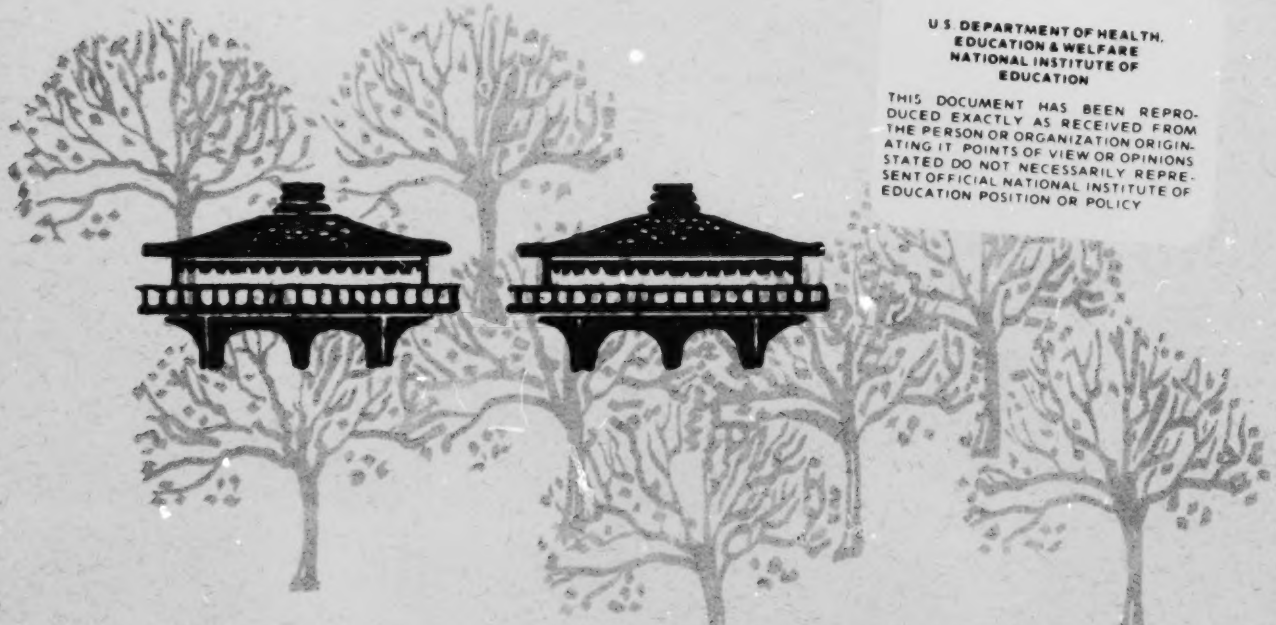

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SYSTEM FOR COLLECTING, ANALYZING, AND SHARING INFORMATION ON INSTITUTIONAL CONSUMER PROTECTION PRACTICES: REGULATORY USER GUIDE

General Introduction

This guide is intended for use by staff of governmental agencies which exercise regulatory authority over postsecondary educational institutions. It describes a simplified system for collecting, analyzing, and sharing information on the policies and practices of the regulated institutions. The policies and practices in question are those which relate specifically to preventing potential abuses of students, who are consumers of the services provided by the institutions. The system is designed to operate within the existing "tripartite" system of determining/maintaining/terminating an institution's eligibility to participate in U.S. Office of Education (USOE) programs of financial assistance for postsecondary students; these programs include the Guaranteed Student Loan Program, the Basic Education Opportunity Grant Program, and the three institution-based programs of College Work Study, Supplemental Education Opportunity Grant, and National Direct Student Loan. Eligible institutions include public, private non-profit, and private proprietary educational institutions offering degree-granting and occupational programs.

The two partners in the tripartite system which have actual regulatory authority are the individual state governments and the federal government. Their role has been examined earlier by the present authors (Helliwell & Jung, 1975) and will not be described further here. The third partner in the system is private, non-governmental accreditation, whose role has also been examined in great detail by earlier authors (Orlans, Levin, Bauer, & Arnstein, 1974) and will

not be described here.[1] It is assumed that readers of this guide are familiar with the tripartite system of eligibility.

The existing consumer protection statutes, regulations and policies of the government regulatory agencies to which this guide is addressed are quite different. In the case of state agencies responsible for chartering, licensing, approving, regulating, or otherwise overseeing postsecondary institutions, their authority ranges from almost complete in some states to almost non-existent in others. In the case of federal agencies responsible for administering the USOE student assistance programs mentioned above, their authority ranges from considerable in the Guaranteed Student Loan Program (GSLP) to slight in the Basic Educational Opportunity Grant (BEOG) program. These differences are not important for the purposes of applying the information collecting, analyzing, and sharing (ICAS) system to be described here; they <u>are</u> important for determining what can be <u>done</u> with the information after it is collected, analyzed, and shared.

The heart of the ICAS system is an Institutional Report Form (IRF), with versions for degree-granting and occupational training institutions. It is a relatively simple 13-topic, 53-item interview guide that can be completed by a knowledgeable regulatory agency staff person in less than two hours. Although some items require elements of subjective judgment in their marking, most items represent objective "the institution does it/doesn't do it," or "has it/doesn't have it" determinations. The 13 topics are:

1. Refund Policies and Practices
2. Advertising Policies and Practices
3. Admissions Practices
4. Instructional Staff Evaluation Practices
5. Disclosure in Written Documents

[1] A separate <u>User Guide</u> has been prepared for possible accreditation uses of the ICAS system. See Jung, Gross, & Bloom (1976).

6. Student Orientation Practices

7. Job Placement Services and Follow-up of Graduates

8. Recordkeeping Practices

9. Maintaining Instruction Staff Stability

10. Representation of Current Approved or Accredited Status

11. Financial Stability

12. Occupational Instruction Programs[1]

13. Occupational Instruction Equipment and Facilities[1]

The critical requirements for each item on the IRF are:

- it relates well to an institutional practice or policy which is generally agreed to be abusive (or the absence of which is generally agreed to be abusive) to students;
- it clearly indicates what practices are undesirable, with no complex statistical transformations required;
- it can be weighted, such that quantifiable scores can be produced for each of the 13 topics;
- it can be verified, either through easily accessible documentation or alternate information sources;
- it can be marked without imposing an unreasonable burden on either the source institution or the collecting agency;
- it taps policies and practices which are modifiable and within the power of an institution to modify; and
- it is at least potentially useful to an institution in its own self-study and self-improvement efforts.

As a result of these requirements, items on public disclosure or minimum acceptable levels of school dropout rate, withdrawal rate, and/or graduate placement rate are specifically not included. It seems clear that such rates, even if they could be calculated accurately and at reasonable cost, are very difficult to interpret meaningfully. For example, there is little definitive evidence to support the simple hypothesis that abusive institutions have higher dropout and default rates or lower placement rates than non-abusive institutions.

[1]These topics are contained in the IRF's for occupational training institutions only.

The evidence that is available does suggest that dropout, default, and placement are much more a function of the socio-economic status, initial employment status, motivation, and employability of entering students. These variables are not within the power of an institution to control, unless it uses discriminatory admissions standards which are generally considered unacceptable and even unlawful.

The remainder of the ICAS system is a set of data coding, key punching, analyzing, and information dissemination specifications, including field-tested and extensively documented computer programs, suitable for immediate implementation for any of the potential regulatory uses to be introduced in the next section of this guide and explained later in detail.

Potential Uses of the ICAS System

Establishing minimum eligibility standards. There is currently a controversy on whether or not governmental agencies are responsible for certifying the "educational quality" of institutions as a prerequisite to eligibility for federal funds. The controversy usually centers on whether this function should be performed by government agencies or private, non-governmental accreditation bodies. However, it seems incontestable that it is the duty and the responsibility of government to protect the rights and property of its citizens, especially students who are being assisted to invest their own time and talents in order to earn an education which will improve their lives. There is incontestably a base of institutional policies and practices which protect student consumers; this base is a prerequisite to educational quality, regardless of how quality eventually comes to be defined or who assumes responsibility for its measurement.

The authors of this guide feel that the IRF items represent one effective basis for suggesting minimum government-enforced standards for educational consumer protection policies and practices of postsecondary institutions which are

eligible for USOE programs. Minimum standards are those below which an institution's eligibility to participate could be refused, suspended, limited, or otherwise placed in jeopardy, subject to the requirements of legal due process. However, such government-enforced standards require a statutory or regulatory basis for their application, and this basis does not now exist in some states or for some federal programs. It is the authors' hope that this guide will aid government agencies as they move in the future to recommend new laws and establish new regulations and enforcement mechanisms, or modify existing ones, so as to require at least a basic set of consumer protection policies and practices of all institutions in advance of certifying them eligible to participate in federal programs. Examples of how this might be done will be provided later in this guide.

Early warning system. As already mentioned, some states and federal programs do have statutory or regulatory authority to enforce minimum consumer protection standards. A major problem in exercising this authority, however, is the sheer magnitude of schools which must be licensed, approved, certified as eligible, and monitored for continuing compliance. For example, over 8300 institutions currently have the privilege to participate in the Guaranteed Student Loan Program. The problem is compounded when money is not available to an agency for hiring personnel to inspect schools, investigate suspected violations, and prosecute actual violators. It is compounded even further when the agency is responsible not only for eligible institutions, but, as in the case of most state regulatory agencies, for all institutions operating in the state -- whether or not they have applied for federal funds.[1] Given the facts of limited resources and sometimes spontaneous occurrence of consumer abuse after long periods of acceptable operation, there is a great need for an "early warning" system which can be used to periodically monitor the consumer protection policies and practices of postsecondary institutions. Ideally, such a monitoring system (a) would require a minimum of effort,

[1] It has been estimated (Summers, 1976) that in California alone, there are currently 2050 postsecondary institutions in operation.

both on the part of the institution and the monitoring agency, and (b) would fit easily into any existing inspection/approval systems already in operation, yet (c) would reliably flag potential problem institutions for more intense scrutiny. There are numerous ways in which the ICAS system can lend itself to early warning uses; some examples will be provided later in this guide.

Communications among regulatory agencies. USOE's Division of Eligibility and Agency Evaluation (DEAE), Bureau of Postsecondary Education, functions to orchestrate the tripartite system of determining/terminating eligibility for USOE-administered student aid programs by attempting to insure that all applicant institutions meet the statutory requirements for eligibility. As mentioned earlier, these include, generally, (a) the offering of an educational program of suitable length, (b) state authorization to operate, (c) private accreditation or evidence of satisfactory progress toward obtaining such accreditation, and (d) compliance with the federal assistance program regulations. One of the major problems of this tripartite system is the lack of consistent communication among the various partners. This leads to problems such as the following:

- a state licensing agency acts to suspend or withdraw the license of a school, but the school's eligibility and accreditation remain intact.
- an accreditation agency withdraws or refuses to award the accreditation of a school, but the school's eligibility remains intact.
- one USOE aid program audits the books of a questionable school and finds irregularities, but DEAE, the school's accreditation agency and the state licensing/approval agency are not notified.
- a state agency acts to withdraw the license of a school; its director and officers move to a neighboring state, open a new school, and soon establish its eligibility for federal funds.

Recently, some progress has been made in establishing informal communication links between the DEAE staff and those of state licensing/approval agencies, private accreditation agencies, and the USOE program administration offices.

This progress has resulted from conferences and meetings held under the auspices of DEAE, the Postsecondary Education Convening Authority of George Washington University's Institute for Educational Leadership, the Education Commission of the States, and others. Informal communications, however, are capricious and unreliable. Important messages tend to be lost or ignored.

The ICAS system described in this guide can serve as the basis for a formal communication link among the partners of the tripartite system. It can provide an "information floor" on the educational consumer protection policies and practices of eligible institutions; to this floor could be added other bits of information which are unique to one or more of the partners but would be useful to the others in making decisions which are unique to their own sphere of influence. Although an ICAS-based system could be structured in numerous ways, the essential concept is that DEAE would maintain central records containing data from a periodic survey of eligible institutions. After institutions had been given the opportunity to verify the accuracy of their own data, summary reports would be generated periodically (e.g., yearly) from this central file and circulated in compendium form to all of the other partners in the system. The other partners could update their own records, based on this compendium, for those schools over which they had jurisdiction. If there were errors, if changes occurred, or if inaccuracies were detected through school inspections or audits carried out by one or more of the partners, periodic (e.g., quarterly) updates could be distributed through DEAE. An advantage of ICAS-type data as the messag for such a communication medium is that these data are relatively objective and standardized in their meaning. They are therefore not dependent on the inconsistent laws, regulations, definitions, policies, etc. of any one partner in the tripartite system. Examples of an ICAS-based communication system will be given later in this guide.

Institutional self-study and improvement. There is currently a vast reservoir of untapped good intentions on the part of postsecondary institutions. It is untapped because a majority of school administrators is still insensitive to the nature of student consumer abuse. The ICAS system can serve as an important basis for institutional self-study and self-improvement; all examples of uses to be described subsequently in this guide provide for voluntary actions on the part of institutions themselves to correct potential abuses prior to or in conjunction with regulatory intervention.

The ICAS system can also identify institutions that are doing an exceptionally good job in protecting their students from abuse. Their experience can be instructive to other institutions which are seeking to bring about improvements in their own policies and practices. Such identification could also serve as a form of reward for institutions, and consideration could be made by regulating agencies for public recognition or other positive incentives.

Collecting Information on Institutional Consumer Protection Policies and Practices

Definition of Educational Consumer Protection

In an effort to define precisely the nature of student consumer abuse, AIR staff undertook a comprehensive search of the literature, which included: (a) the records of hearings conducted by subcommittees of the U.S. House of Representatives Committee on Education and Labor and Committee on Government Operations; (b) reports published by the Education Commission of the States as a result of two national conferences on student consumer protection; (c) a report published by USOE as a result of a national conference on institutional eligibility; (d) the 40+ volume file put together by the staff of the Federal Trade Commission in support of their proposed trade regulation rule for proprietary vocational and home study schools; (e) the student complaint files of USOE's Accreditation and Institutional Eligibility Staff (now DEAE); and over 60 other sources (see Helliwell & Jung, 1975). In general, we were seeking to identify institutional policies and practices which had the potential to mislead students and frustrate their efforts to obtain an education. We made several decisions which should be made explicit here.

Students are consumers. Some authors have attempted to contend that students, as participants in the educational process, are not "consumers," in the true sense of that word. While we do believe that a good deal of the responsibility for learning during any educational experience rests with the student, it is clear that some school practices deprive the student of even an opportunity to learn; furthermore, some practices are so blatantly fraudulent and unfair that they would be abusive regardless of the product or service that was being offered. To the extent that schools do market an

educational service, students are the consumers.

Consumer protection is unequal to better educational decision making. Numerous calls have been registered for systems to assist students in making better decisions about postsecondary education. Such calls usually include requests for disclosure of better student information on the course options, social climate, financial aid, etc. available at an institution, plus providing an insight into the world of work and the student's own goals, interests, abilities, limitations, etc. Information of this type is no doubt an aid to student decision making. However, such information is not the same as information about institutional practices which abuse students. "Student consumer protection" should be carefully distinguished from "better student decision making;" we feel this distinction can help avoid much unnecessary confusion and wasted effort.

The major kinds of consumer abuse. Appendix A presents a list of potentially abusive institutional practices categorized according to the 13 topics listed on pages 2 and 3 of this guide. Admittedly there is a thin line between "sharp" business operations or unintentional oversight and educational malpractice. As pointed out earlier, practices which are illegal in one state may be perfectly legal in the neighboring state. The listed practices are those which clearly (a) are designed to mislead students, (b) endanger students' opportunity to receive the promised educational services, or (c) deny students proper recourse. There are no doubt other potentially abusive practices, and in the course of our literature review we discovered many of them. The ones listed in Appendix A were chosen because they represented, in our judgment, the set that was most dangerous to federally-assisted students and most easily detectable without recourse to (a) excessive subjectivity (e.g., "the administrators are not of 'good moral' character"); (b) excessive expense (e.g., "the school is not

'bonded' for X dollars"); or (c) unproven theses (e.g., "the school does not provide a 'cooling off' period for students at the end of which their enrollment is cancelled unless they reaffirm their intention to attend" or "does not have evidence that 51+ percent of its graduates are working in 'training related' jobs").

The converse of the abuses listed in Appendix A constitutes our operational definition of education consumer protection... institutional policies and practices which (a) provide disclosure of salient facts, (b) safeguard students' opportunity to receive promised educational services, and (c) provide students with proper recourse.

The Institutional Report Forms

Two IRF's have been designed to collect information from degree-granting and occupational training institutions about the potentially abusive practices listed in Appendix A. In all cases, the IRF items have been selected according to the critical requirements listed on pages 3 and 4 of this guide. A "yes/no/not applicable" response format has been adopted for all except two items (on instructional staff stability), which require the entering of a number and a percent. The IRF's are structured as interview guides, to direct the questions of regulatory agency staff who are present at the institution being assessed.[1] IRF completion requires an interview with institutional administrators and an examination of certain institutional policy statements, records, and public

[1] The IRF's were originally designed as self-report questionnaires, to be completed and certified by institutional administrators themselves. The self-report feature was abandoned during the field testing stage on the insistence of the Office of Management and Budget (OMB). OMB officials argued that honest responses to some of the IRF items could be held as self-incriminating; other comments further argued that a small percentage of dishonest school officials would lie about their policies and practices, thereby forcing the use of some kind of auditing mechanism which could become expensive and unwieldy. Although the authors of this guide felt a practical auditing mechanism could be developed, they were willing to give first priority to a system that could be more immediately implemented. For a further discussion of this issue, see the final project technical report (Jung, Hamilton, Helliwell, Gross, Bloom, Shearer, & McBain, 1978).

dissemination and disclosure materials. The interview and examination require from 30 minutes to two hours, depending on the obtained responses.

Appendix B contains the basic IRF for Postsecondary Occupational Training Institutions. Appendix C contains modifications to the occupational IRF which make it more appropriate for degree-granting institutions. These appendices also contain a brief discussion of the purpose of each of the 13 topics and detailed instructions for asking and marking each item.

The occupational IRF (Appendix B) should be used for any institution which offers terminal occupational programs of postsecondary education. If the institution <u>also</u> offers transfer-oriented programs or degrees in association with its occupational programs (e.g., the A.A. or A.S. degree), the occupational IRF is still appropriate. If the institution offers <u>only</u> a program of higher education leading to baccalaureate or graduate degrees, the degree-granting IRF (Appendix C) is appropriate.

Whenever possible, each item in the IRF should be marked; an attempt has been made to provide "Not Applicable" response options in each case where an item might prove inappropriate for an institution of limited size or educational purpose. These options should always be used in preference to omitting an item. Missing responses can prove to be very troublesome during the analysis of IRF data, to be discussed in the next section.

Analyzing Data on Institutional Consumer Protection Policies and Practices

The data analysis specifications for the ICAS system have been formulated to accomplish the following steps for each institution which is assessed by an IRF: (a) convert the hand marked responses in the Interview Guide (Appendices B and C) into coded, computer processable data; (b) weight these data by computer according to the seriousness of each response as an indicator of potential consumer abuse; (c) print out summary weighted scores for each of the 13 topics on the IRF[1] and overall institution score (these are called Topic Scores and the Institution Score, respectively); and (d) provide for the verification of these scores, and their correction in the event of data processing errors.

These analysis specifications are computer-based because we felt that hand processing would be too laborious and too prone to error for any large scale applications of the ICAS system; the break-even point (that point at which computer processing will probably be cheaper and more efficient than hand processing) is approximately 50 institutions per year.

It is not possible for the authors of this guide to predict the type of electronic data processing equipment which will be available to any particular user of the ICAS system. We have therefore chosen to avoid equipment-specific terminology and use generic names where possible.

Coding and Editing the IRF Data

IRF responses are coded by keytaping or by direct data entry through a remote terminal. Appendix D contains the specifications and instructions for coding and editing IRF data for input into the weighting computer program described in the next section. If keytaping is used, we have assumed a 120

[1] Only 11 topics on the Degree-Granting IRF (see Appendix C).

byte record length. Because each IRF record requires 172 bytes, two records are required under this option. Column 2 of Appendix D contains the length in bytes of each item; column 3 contains the sequential byte location for each item under the keytaping option; and column 4 contains the sequential byte location for each item under the direct data entry option or for the merged record under the keytaping option. It is essential that these data locations be maintained exactly in order to preserve the accuracy of the weighted data to be produced by the computer program. In general, we have adopted a system of coding '0' for NO answers, '1' for YES answers, '8' for not applicable responses and '9' for missing data. These instructions are contained in column 5 of Appendix D. All coding should be routinely verified, and a frequency distribution of the coded data should be created and inspected for out-of-range numbers.

Editing can be done either before the IRF's are coded or during the coding operation. Editing is the process of inspecting for directed omissions, missing data, etc., to insure that they are coded according to the specifications in column 5 of Appendix D.

Weighting the Coded IRF Data

IRF responses are weighted according to the severity of the potential institutional abuse they reveal. The weighting procedure is an essential part of the ICAS system, because any attempt to quantify the adequacy of an institution's consumer protection policies and practices requires that allowances be made to discriminate between major and minor potential abuses.

The IRF weighted score is somewhat like a golf score. The higher the score, the worse the performance. Each revealed potential for abuse adds weighted points; the greater the potential for abuse, the more points. An institution's

overall score is the sum of all its points, and the higher the score, the more likely students are to encounter abuse.[1] Topic scores are the similarly summed points for each of the 13[2] topics on the IRF. Appendix D (column 6) contains the weights to be applied to each item on the IRF.

A computer program written in the PL/1 language performs the mechanical operations of taking the coded IRF responses as input and producing the weighted Topic and Institution Scores as output. This printed output is identified according to an 11 digit school ID number, which can be modified as necessary according to the unique needs of the user. Each school, however, must have some similar unique designator, since the program is designed to process a large number of IRF's at one time. A program listing is included as Appendix E.

It is always wise to routinely weight a randomly selected 5% sample of IRF's by hand and compare the hand-calculated results with those produced by the computer to verify the accuracy of the scores.

Interpreting Topic and Institution Scores

An institution may achieve a "perfect" zero Institution Score or Topic Score on the IRF by not having any weighted responses marked. This situation is rare. In a 37 institution field test[3] of the IRF's, Institution Scores ranged from 90 to 430. The worst possible Institution Score is 1150. Table 1 contains a summary of the maximum (worst possible) weighted Topic Scores for each topic.

Institution Scores for occupational and degree-granting institutions in the field test are presented in Appendices F and G. These appendices represent

[1] Scores are actually averages, calculated on the basis of all IRF items which are marked; this averaging is necessary to correct for the influence of missing data (i.e., omitted responses). It is useful, however, to consider the IRF weighted scores as a sum.

[2] 11 on the Degree-Granting IRF.

[3] For a description of this field test, see the final project technical report (Jung, et al., 1976).

a primitive set of norms against which newly-obtained IRF scores may be compared. As experience with the use of the ICAS system expands, more representative norms will no doubt emerge.

Table 1

Maximum Possible IRF Weighted Scores

Topic Score	Occupational	Degree-Granting
1. (Refund Pract.)	1000	1000
2. (Advertising Pract.)	1450	1450
3. (Admissions Pract.)	1090	1090
4. (Inst. Staff Eval.)	1130	1130
5. (Written Disclosure)	650	640
6. (Student Orient.)	800	800
7. (Job Placement)	1180	1180
8. (Recordkeeping)	1330	1330
9. (Staff Stability)	2500	2500
10. (Status Represent.)	1500	1500
11. (Financial Stability)	2140	2140
12. (Inst. Programs)	1880	N.A.
13. (Inst. Facilities)	1500	N.A.
Institution Score	1150	1070

Example Applications of the ICAS System

The examples cited on the following pages are, in the judgment of the AIR staff, practical applications of the ICAS system, i.e., applications which can (and should) be undertaken immediately by regulatory users. Where mention is made of existing norms (i.e., comparison bases for estimating the relative magnitude of an IRF item response, Topic Score, and/or Institution Score), the reference is always to the 37 institution field test of the ICAS system conducted by AIR in three states during early 1976. Field test data are contained in the final project technical report (Jung, et al., 1976).

Establishing Minimum Eligibility Standards

As part of the general conditions for eligibility for federal student assistance programs under Title IV of the Higher Education Act, the Commissioner of Education is authorized to establish regulations which are designed to "promote the purposes of these programs," including regulations which prescribe "reasonable standards" of financial responsibility and appropriate institutional capability for eligible institutions. Although there is disagreement about the extent to which this statutory language authorizes the Commissioner to establish so-called "consumer protection" standards as a condition for eligibility, a select USOE task force recently concluded that "OE has the responsibility to insure that...the recipients of such funds are adequately protected against unscrupulous practices,"[1] and called for "continuous review (of) the criteria for determination of, or termination of, eligibility for institutional participation in OE administered financial aid programs, and...appropriate recommendations for change."[2]

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[1] Final Report, Task Force on Implementing Educational Consumer Protection Strategies, USOE/DHEW, June 11, 1976, p. 2.

[2] *Ibid.*, p. 3.

We recommend that these criteria can and should include minimum consumer protection standards based upon the entire set of abuse categories contained in Appendix A. We have compiled a set of such standards in Appendix H. This set could be implemented by any government agency with regulatory responsibility; the agency would at the same time be required to implement a system for monitoring institutional compliance and prosecuting violating institutions by possible limitation, suspension, or termination of their eligibility (following proper procedures of due process); not coincidentally, the ICAS system is designed to be the basic vehicle for such monitoring. The procedures would be the same as for the early warning system to be described in the next section.

Early Warning System

In this section, we postulate a government regulatory agency which currently has the responsibility and the necessary jurisdiction to enforce minimum student consumer protection standards on postsecondary institutions. We shall call this agency RAPS (Regulatory Agency to Protect Students); it can be a local, state, regional, or federal agency--the location is unimportant for the purpose of this example.

RAPS is responsible for overseeing over 1000 postsecondary institutions, both occupational and degree-granting, both private and public. Part of RAPS' mission is to monitor the compliance of these institutions with a set of consumer protection regulations which were recently promulgated under its statutory authority. RAPS has a small staff of personnel whose job is to make periodic, regular visits to all approved schools. While at a school, a RAPS staff member has a large checklist of things to "inspect," including compliance with civil rights and health and safety regulations, fiscal reporting requirements for various funding programs, and the compilation of various required statistics. On the average, each of the 1000 institutions for which RAPS is responsible is

visited once every two years; the visits average one day in length. Occasionally, complaints or rumors will cause RAPS to pay somewhat closer attention to a school; a special staff investigator may be sent out to question school personnel about some possible violation of the consumer protection regulations. In about half of these cases, no violation is detected; in the other half, school officials grant tuition or fee refunds to the complaining students without admitting any guilt. The complaints which do find their way to RAPS, however, are generally regarded to be the merest tip of the iceberg.

RAPS is now implementing an ICAS-based "early warning" system to allow it to make more efficient use of its available staff time. For the past six months, school inspectors have completed an IRF during each school inspection. School officials immediately receive a copy of their completed IRF; the originals are returned by mail to the RAPS headquarters where they are processed weekly by computer. RAPS now has an almost complete file that lists the Topic and Institution Scores for approved institutions. Schools which have Institution Scores of over the 75th percentile (500, in this case) are automatically brought to the attention of the small RAPS investigations staff. Although they do not accept the ICAS system scores as evidence of any violation of RAPS' regulations (since the ICAS minimum standards and RAPS' minimum standards are not identical), they use a high score as an <u>indicator</u> of potential consumer abuse at the high-scoring school, and immediately send an investigation team to the school to talk to students, examine advertising, and check financial and student records. In the past six months, three schools which were found to be engaged in fraud were cited to court and changes were voluntarily brought about in the policies and practices of 22 additional schools.

The additional two hours per school required to complete the IRF is a small percentage (less than 5%) of the total time spent by RAPS personnel in making

school inspections, counting their travel and preparation time. RAPS inspection staff have welcomed the specificity of the IRF questions as a concrete basis for their visits to schools, as contrasted with the intuitive mode they were forced to depend on before. They are also pleased with the number of pro-consumer changes school officials have been willing to make in policies and practices as a result of their questions, especially by officials of schools whose existing concern for consumer protection is already very keen.

Investigatory personnel are pleased that they now have something specific to go on in selecting schools for closer attention, rather than vague rumors or undocumented student complaints.

The total cost of implementing the ICAS system in RAPS has been about $25,000. All of the developmental costs were absorbed by a federal (USOE) grant, including those for developing the IRF and its associated computer processing and scoring programs. The major categories of ICAS costs are printing, staff training, and data processing (which is contracted to a private data services firm). On the drawing boards are plans to make available to consumer groups, counselors, parents, and individual students the Institutional Scores of any school under RAPS' jurisdiction. RAPS officials feel that high-scoring institutions will be moved by consequent consumer pressures to institute changes in their operating policies and practices, even if they cannot be currently forced by regulation to make these changes. A short interpretive guidebook is being prepared to go along with any scores that are disseminated.

Legislators, who in the past were fond of reading student complaints into the record and asking what RAPS proposed to do about them, are being briefed on the new ICAS system. Funds for its expansion and improvement have already been promised, but RAPS officials have asked that the money instead be appropriated to increase their investigation and prosecution capabilities.

They have also suggested that new minimum standards for institutional consumer protection policies and practices be written into law, so that the ICAS system will serve more of a school monitoring than an "early warning" function.

School officials, at first enraged at the prospects of increased government regulation and red tape, and railing at the thought of being more subjected to the (to them) unprofessional judgment of inexpert RAPS staff, have found that the reasonable policies and practices called for by the ICAS system actually have improved their student recruiting efforts, have brought about an increased rapport with their student bodies, and have allowed them to better understand the nature of RAPS' regulation. They have also appreciated that several of their more predacious competitors have been forced out of operation or have been forced to make major changes in their operations by RAPS as a result of the ICAS system. A group of school officials has recently agreed to serve on a RAPS advisory board to recommend future uses of ICAS and to monitor their implementation.

One possible option that has been discussed is to allow the Center for Educational Statistics (CES) to gather and process the IRF data as part of its routine institutional survey, thereby reducing the workload on RAPS. Since CES already has a survey and data processing capability, this option has been receiving increasing attention. All monitoring and investigation responsibilities would stay with RAPS.

Communications Among Regulatory Agencies

The tripartite model of institutional eligibility for federal programs exemplifies a system of independent, overlapping responsibilities and mutual checks and balances among two regulatory partners--the states and USOE--and a non-regulatory (and sometimes unwilling) partner--private accreditation. As with any system of this nature, its functioning can be improved if the partners understand their own roles and cooperate with the other partners in the exercise of their respective roles.

In this guide, we have contended that it is the responsibility of the government regulatory partners[1] to establish, monitor, and enforce minimum consumer protection standards on institutions who wish to participate in the USOE-administered student assistance programs. It is the responsibility of the accreditation partner to evaluate, certify, and help to improve the quality of an institution's educational program relative to its stated educational goals. We believe that minimal institutional consumer protection policies and practices are the base, the *sine qua non*, of "educational quality." Therefore, when it comes to the sharing aspect of the ICAS system, all three partners have a reasonable interest in systematic mutual communications. And the central element of shared interest is information on the consumer protection policies and practices of institutions seeking to gain or hold the privilege of eligibility.

DEAE, as the coordinator of the tripartite system, is the logical center for communications of such mutual interest. The ICAS system is the logical vehicle. Depending on the degree to which the previously-described "early warning" application is implemented by states and USOE and programs, the mutual communication application can take two different forms.

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[1] Note that we explicitly exclude a role for non-partners, such as the Federal Trade Commission and the Veterans Administration, in this system.

Early warning ICAS system implemented. If an early warning (or school monitoring) system based on the ICAS is in place, DEAE needs only to tap the central records of the RAPS (whichever agency it may be) and formally circulate Topic and/or Institution Scores of eligible institutions through a periodically updated document. DEAE could also place these scores in its own data banks for retrieval on a request basis for any other governmental or non-governmental users of the federal eligibility determination system. Since these scores might be the basis for important decisions about an institution, every effort should be made to maintain accuracy and allow institutions to be aware of and periodically verify the accuracy of their own scores as recorded in the DEAE system.

To acquaint potential data users with the nature and meaning of ICAS scores, DEAE should conduct training conferences, and perhaps modify this guide into a general Training/Users' Manual of some sort to be distributed free of charge. In addition, technical assistance could be provided to the RAPS to assist in whatever needs were revealed in setting up the information transfer mechanism between the two agencies.

Early warning ICAS system not implemented. It is not likely that a RAPS will emerge immediately at the federal level.[1] A state-level RAPS with very limited geographic coverage is a less remote possibility, but its ICAS data would be of very limited interest and probably could not serve as the basis for a formal communication system. How then is DEAE to gather ICAS data for communicating to the three partners in the tripartite system? There are several options.

USOE Regional Office personnel levels could be expanded and given the

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[1] This is not necessarily from lack of federal staff desire; more from lack of personnel, funds, and a firm administrative commitment within USOE at the present time.

responsibility of supplying the IRF's for the ICAS system; this option is unrealistic.

Regulatory agencies in each state could be designated by the state, and trained and paid by USOE, to carry out the data gathering function. This arrangement, similar in structure but not in responsibility to the state course approving agency network of the Veterans Administration, would be costly. Also, unless the state agencies could somehow be made accountable for the quality of the data produced by their staff, the accuracy of ICAS scores could be reasonably challenged.

A more practical option would seem to be to return to AIR's original proposal--a self-report IRF to be filled out by institutional administrators themselves and subjected to: (a) random audits by a small DEAE staff, (b) inspection by "competing" institutions, and (c) public review by other regulatory users, consumer groups, parents, and students. We envision a system where there might be some intentional lying, some unintentional misreporting; however, on the positive side, there would be a great incentive for institutional self-improvement and a negative incentive for being caught lying by USOE, peers and/or students. The time required of an institution would be little more than two hours per year, and a good deal of the work could be done by an assistant to the Chief Executive Officer (CEO). The CEO should, however, be asked to certify the accuracy of the completed IRF.

Parts of this system, especially the data collection and processing, could be contracted out by DEAE on a continuing basis; alternatively, early contacts with the National Center for Educational Statistics (NCES) could be revived to make the IRF part of the Higher Education General Information System (HEGIS) and the annual NCES Occupational School Survey.

Some commentators on an earlier discussion of this self-report system

have contended that school officials and national school organizations would raise a great outcry against this new, unwarranted intrusion of federal red tape into their ivy-covered domains. Unfortunately, we were not able to field test the validity of this hypothesis during this project. The AIR staff remain of the opinion that a self-report IRF-based data collection and communication system is reasonable, relatively unobtrusive, and potentially very useful to the cause of improving educational consumer protection. School administrators, as a largely reasonable group, might also be brought to this view.

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APPENDIX A

Categories and Examples of Potentially Abusive

Institutional Policies and Practices

A. Refund Policies and Practices

1. Institution does not have a written refund policy for fees or charges collected or obligated in advance of enrollment or class attendance.

2. Written refund policy is not publicly disseminated to students and prospective students.

3. Written refund policy does not tell students how to obtain refunds.

4. Written refund policy does not provide for at least partial return of student fees or charges based on the amount of instruction the student has had the opportunity to receive.

5. Written refund policy does not specify the maximum time allowed between the receipt of a valid refund request and the issuance of a refund.

B. Advertising Practices

1. Institution uses:

(a) advertisements in "help wanted" section of newspapers, pseudo "Talent" contests;

(b) testimonials or endorsements by actors who did not attend the institution; or

(c) limited time "discounts," to attract enrollees.

2. Advertising of the institution guarantees or implies that completion of an education or training program will lead to employment.

3. Institution's advertising implies that it:

(a) has special ties or connections with employers which it does not in fact have;

(b) offers full or partial scholarships when in fact it offers only loans or deferred tuition;

(c) has recognized experts on its teaching faculty who in fact have no teaching responsibilities; or

(d) offers a "superior" educational program when in fact there is no comparative evidence to support the assertion.

C. Admission Practices

1. Institution employs admissions representatives whose compensation or salary is dependent wholly or in part on direct commissions based on number of students enrolled.

2. Institution does not have a written policy governing recruiting and/or admission practices.

3. Written recruiting/admissions policy does not contain:

   (a) any prohibitions against unethical practices such as the "bait and switch" or the "negative sell";

   (b) a requirement that all prospective students talk to a representative of the institution at the school prior to enrolling; or

   (c) a requirement that all enrollees sign an agreement which describes complete costs, payment requirements, and educational services to be provided by the institution.

4. Institution does not provide remedial instruction in basic skills for students who are admitted without meeting stated admissions requirements.

D. Instructional Staff Evaluation Policies

1. Teaching competence is not included as one criterion in formal salary and/or tenure and/or rank review policies.

2. Evaluations of teaching competence do not include regular, anonymous ratings by students.

E. Disclosure in Written Documents

1. Failure to disclose any of the following in a general catalog, bulletin, or other basic information document:

   (a) name and address of school.

   (b) date of publication of the document.

   (c) school calendar including beginning and ending dates of classes and programs, holidays, and other dates of importance.

   (d) a statement of institutional philosophy.

   (e) a brief description of the school's physical facilities.

   (f) an accurate list of all courses actually offered.

   (g) an indication of when specific required courses will <u>not</u> be offered.

   (h) educational content of each course.

   (i) number of hours of instruction in each course and length of time in hours, weeks or months normally required for its completion.

(j) an accurate listing of faculty who currently teach.

(k) an indication of the distinction between adjunct or part-time faculty and full-time faculty.

(l) policies and procedures regarding acceptability of credits from other institutions

(m) general acceptability by other institutions of credits earned at this institution.

(n) requirements for graduation.

(o) statement of certificates, diplomas, or degrees awarded upon graduation.

(p) statement of all charges for which a student may be held responsible.

(q) financial aid programs actually available to students.

(r) limitations on eligibility for financial aid programs.

(s) grading system.

(t) policies relating to:

(1) tardiness
(2) absences
(3) make-up work
(4) student conduct
(5) termination
(6) re-entry after termination

(u) student fee increases in excess of $25 that are planned within the next year.

(v) for student loan applicants:

(1) the effective annual loan interest rate
(2) loan repayment obligations
(3) loan repayment procedures
(4) time allowed for repayment
(5) deferment or cancellation provisions, if any
(6) collection procedures which might be applied in the event of failure to repay

2. In the event any of the following services or facilities are provided, failure to disclose their actual availability and extent:

(a) Job placement assistance or service.

(b) counseling, including for employment, academic, and/or personal problems.

(c) dining facilities.

(d) housing facilities.

(e) student parking facilities.

3. In the event the institution offers an educational program which leads to the award of degrees (or which results in credits which are transferable toward the award of degrees), failure to provide accurate descriptions of:

   (a) recognition by a state agency as meeting established educational standards for granting degrees, if there is such an agency;

   (b) the scope and sequence of required courses or subject areas in each degree program; and

   (c) policies and procedures which students must follow to transfer credits within the institution and/or to other institutions.

F. Student Orientation Procedures

1. The institution does not conduct a formal orientation program for newly enrolled students.

2. Failure to include in this orientation the following:

   (a) oral presentations or written documents prepared by students who have been previously enrolled at the institution.

   (b) instructions on how and where to voice student complaints and grievances.

   (c) information on how and where to apply for student financial aid.

G. Job Placement Services and Follow-Through

1. In the event the institution claims to have a job placement service, this service does <u>not</u> include the following apsects:

   (a) notification of fee charged, if this is the case.

   (b) formal training in job-seeking and job-holding skills.

   (c) contacting prospective employers to develop potential jobs.

   (d) making job interview appointments for individual students, including those seeking part-time employment and recent graduates.

2. In the event the institution claims to have a job placement service, the service is confined only to such services as distributing "Help wanted" ads from newspapers or referral to a commercial placement service.

3. The institution does not regularly collect follow-up data on the employment success of former students who did not graduate, recent graduates, and/or longer term graduates.

4. Institution does not annually calculate the rates of student attrition from each identifiable program or curriculum area and does not attempt to determine the reasons for this attrition.

H. Recordkeeping Practices

1. The institution does not maintain the following items in its individual student records:

   (a) total fees paid by the student.

   (b) courses taken and completed.

   (c) academic credits, grades earned.

   (d) financial aid amounts, including loans, if any, actually received by student and date of his/her receipt.

2. Institution does not have a written policy and actual procedures for maintaining individual student access to records for a period of at least two years following his/her departure from the institution, regardless of the operating status of the institution.

I. Turnover of Instructional Staff

1. Instructional staff are repeatedly replaced, in the same sections/courses, after instruction has begun.

2. Instructional staff are replaced in two or more sections/courses after instruction has begun.

J. Representation of Chartered, Approved, or Accredited Status

1. The institution fails to disclose to students and prospective students the fact(s) of limitation(s) or sanction(s) for noncompliance with designated standards imposed by local, state, or federal government agencies, if any exist.

2. The public representations of the institution fail to distinguish between (e.g., list separately, with appropriate explanations) institutional accreditation, specialized or professional program accreditation, state VA-approving agency course approval, and state chartering and licensing, if any are present.

K. Financial Stability

1. If the institution is not publicly-supported, it does not have the following:

   (a) an endowment or retained earnings fund to pay current operating expenses if they are not covered by student tuition receipts.

   (b) a reserve of funds sufficient to pay out tuition refunds as students make legitimate requests for them.

2. The institution's financial records and reports are not annually subjected to a certified audit.

L. Instructional Programs in Occupational, Professional Preparation Areas

1. The institution does not maintain curriculum advisory committees which include representatives of potential employers in each occupational/professional area for which instruction is offered.

2. The institution does not provide the following, when they are required for employment of graduates in an occupational/professional area:

   (a) specialized/professional program accreditation.

   (b) training in the use of basic tools and equipment.

   (c) internships and/or supervised practice on the job.

   (d) internships and/or supervised practice in simulated job situations.

   (e) instruction on topics necessary for state or professional certification of graduates.

3. The institution does not require a biannual review of the relevance and timeliness of occupational/professional curricula.

M. Instructional Equipment and Facilities in Occupational/Professional Preparation Areas

1. The institution does not maintain advisory committes on instructional equipment and facilities which include representatives of potential employers in each occupational/professional area for which instruction is offered.

2. The institution does not annually budget and expend funds for replacing worn or outdated instructional equipment in each occupational/professional area for which instruction is offered.

APPENDIX B

INSTITUTIONAL REPORT FORM:

AN INTERVIEW GUIDE

for

Postsecondary Occupational Training

Institutions/Programs

developed by

The American Institutes for Research
P.O. Box 1113
Palo Alto, California 94302
(415) 493-3550

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Introduction

This form is designed to serve as the basis for on-site assessments of the consumer protection policies and practices of postsecondary educational institutions. It is meant to be used by officials of government regulatory agencies or by members of non-governmental accreditation teams in conjunction with their inspection visits to institutions which are eligible for or are applying for eligibility for federal student assistance programs. The uses of the items in this form and their scoring and analysis procedures are described in separate users' guides; these guides should be studied in detail before attempting any institutional assessments.

Some of the items in this form may be completed on the basis of an interview with officials of an institution to be assessed. Other items require that you acquire and read the institution's catalog, certain written policy statements (if they are available), and representative advertising copy (if available). Depending on the size of the institution and its complexity, completing the form will take from under 30 minutes to over two hours.

One purpose of the form is to stimulate an institution's own efforts to protect the consumer rights of its students and prospective students. No institution is perfect in this regard. Therefore, you are urged to share all questions with officials of the institution being assessed; this sharing can help them to bring about any needed improvements voluntarily.

Each topic in the form is introduced by a brief rationale explaining the nature of the potential abuse it is designed to detect. Where there may be questions about the meaning of an item, interviewer notes are inserted. Most item response options include a provision for cases where the item is not applicable to the institution being assessed; as a general rule, if "not applicable" response options are not provided, and the item does not apply, leave the item blank. However, omissions should be avoided whenever possible.

Refund Policies and Practices

Rationale for this topic: One of the most common sources of student complaints about postsecondary educational experiences is institutional failure to refund tuition and fee payments. Institutions are clearly justified in requiring advance tuition and fee payments and retaining a portion of these payments to cover processing costs in the event a student withdraws for reasonable cause. However, it is generally agreed that all institutions should have a written refund policy stating clearly when and under what conditions refunds will be granted and should make timely refunds (without inordinate delay) to students who abide by stated institutional policy. There is less general agreement but strong support for "pro rata" refund policies, in which students receive a refund equal in proportion to the percentage of prepaid instruction they did not receive, minus a fair amount to reimburse institutional processing costs.

1. Does this institution require students to pay or otherwise obligate to pay any of the following fees or charges in advance of enrollment or class attendance? Fill in one oval for each option.

	No	Yes	
1a	0	0	Resident tuition of tuition generally applicable to all students.
1b	0	0	Non-resident tuition or tuition paid only by certain groups of students.
1c	0	0	Room and board charges or deposits.
1d	0	0	Application or registration fees in excess of $50.
1e	0	0	Other required student fees in excess of $50 (excluding books).

If you filled in "no" to all the options above, skip the following three items and go on to page 4, Advertising Policies and Practices.

2. Does this institution have a written refund policy regarding all those fees for which "yes" was checked in item 1? Fill in one oval.

	No	Yes
2a	0	0

If you filled in "no" to item 2 above, skip the following two items and go on to page 4, Advertising Policies and Practices.

3. How is the written refund policy made available to students? Fill in one oval for each option.

	No	Yes	
3a	0	0	It is made available for public inspection at the institution.
3b	0	0	It is printed in the school's general catalog or bulletin.
3c	0	0	It is distributed to all enrolled students.
3d	0	0	It is distributed to all prospective students.

4. Does this institution's written refund policy specify the following items? Fill in one oval for each option, after reading the policy statement.

	No	Yes	
4a	0	0	Those fees and charges which are not refundable.
4b	0	0	All conditions which students must meet to obtain refunds.
4c	0	0	How to properly apply for a refund.
4d	0	0	A refund formula by which students pay, in effect, only for the instruction they have actually had the opportunity to receive.
4e	0	0	Any non-refundable application processing fee or other types of non-refundable student fees exceeding $50.
4f	0	0	A limitation on the time allowed between receipt of a valid refund request and the issuance of a refund.

Rationale for item 4: These are aspects of a refund policy which are desirable for all institutions which collect fees in advance. Students need to know when they qualify for a refund and how they must apply for it. Also, students should be able to assume that institutions will process valid refund requests within a reasonable period of time. Large non-refundable application or processing fees should be avoided and should never be applied without ample advance notice to enrollees and students. "Pro rata" tuition refund policies are required for veterans receiving benefits from the Veterans Administration and are imposed on proprietary schools in some states to curb the use of "hard sell" techniques by sales representatives.

Advertising Policies and Practices

Rationale for this topic: More and more schools are using advertising as a technique to increase enrollments. Abusive advertising occurs when false, misleading, or unsubstantiated claims are made, whether or not the abuse is intentional. All institutions which use the public media in attempting to attract students should be aware that certain specific practices (which are in fact illegal in a number of states) involve a potential for abuse. If the institution chooses to use them anyway, regulatory bodies and consumers should be made aware of the fact. Further, the Chief Executive Officer of an institution should be responsible for the advertising practices of that institution. If advertising is released without the director's review, especially by personnel who stand to gain from increased enrollment, there is a higher probability that misleading advertising will result.

1. Does this institution use the following advertising techniques in attracting applicants for admission? Fill in <u>one</u> oval for each option, after reading a representative sample of the institution's advertising, if possible.

	No	Yes	
1a	0	0	Classified ads in the "Help Wanted" section of the newspaper, <u>not</u> for employed positions at the institution, but to obtain "leads" on potential students.
1b	0	0	Competitions or contests in which virtually everyone "wins," designed only to stimulate enrollments.
1c	0	0	Testimonials or endorsements by persons who did not, in fact, attend this institution.
1d	0	0	Offers of limited time "discounts" on tuition charges, room and board charges, etc.

2. Does this institution make the following statements in any of its advertising? Fill in <u>one</u> oval for each option, after reading a representative sample of the institution's advertising, if possible.

	No	Yes	
			↓ This institution does no advertising of any type (including professional journal or telephone directory notices).
2a	0	0	0 Completing the education or training offered at this institution guarantees employment.

	No	Yes	This institution does no advertising of any type (including professional journal or telephone directory notices).	
2b	0	0	0	Completing the education or training offered at this institution is likely to lead to employment, without presenting accurate supporting data.
2c	0	0	0	There are ties or connections between this institution and specific employers which will result in special employment considerations for graduates, when in fact there are no such ties.
2d	0	0	0	Scholarships or other forms of no-cost financial assistance are available, when in fact they have not been awarded during the past year.
2e	0	0	0	The educational program is superior to the educational program offered at competing institutions.
2f	0	0	0	Recognized experts or other types of well-known persons are on the teaching faculty, when in fact they have no teaching responsibilities.

3. Does a responsible administrative officer of this institution (or higher administrative level, for example, district or corporate office) review advertising copy before it is released? Fill in <u>one</u> oval for each option.

	No	Yes	This institution does no advertising of any type (including professional journal or telephone directory notices).	
3a	0	0	0	Some or most of it.
3b	0	0	0	All of it.

Admissions Practices

Rationale for this topic: There is a fine line between innovative, active admissions practices and abusive admissions practices. The latter are one of the most frequently cited topics of student complaints, yet active recruitment is becoming more and more essential for institutional survival in this time of declining enrollments. The present topic area attempts to inquire about techniques which have a high potential for causing abuse, as judged by common sense, recent literature, and documented student complaints.

1. Does this institution employ admissions representatives whose compensation or salary is based wholly or in part on commissions? Fill in one oval.

	No	Yes
1a	0	0

If you filled in "no" to item 1 above, skip item 2 and go on to item 3.

2. How are these commissions calculated? Fill in one oval for each option.

	No	Yes	
2a	0	0	They are based on the number of students enrolled.
2b	0	0	They are based on the number of students enrolled who actually attend classes.
2c	0	0	They are based on the number of students enrolled who graduate.

3. Does this institution have a written policy which governs recruiting and/or admissions practices? Fill in one oval.

	No	Yes
3a	0	0

If you filled in "no" to item 3 above, skip item 4 and go on to item 5.

4. Does this institution's written recruiting and/or admissions policy specify the following items? Fill in one oval for each option, after reading the policy statement.

	No	Yes	
4a	0	0	A code of ethics which prohibits certain recruiting/admissions practices.

	No	Yes	
4b	0	0	A requirement that prospective students talk to a staff member, at the institution, prior to enrolling.
4c	0	0	The completion of a signed enrollment agreement which describes costs, payment requirements, and educational services to be provided by the institution.

5. Does this institution have a policy of regularly admitting students who do not meet stated admissions requirements? Fill in <u>one</u> oval.

	No	Yes	↓ This institution has no stated admissions requirements.
5a	0	0	0

If you filled in "no" or "no stated admissions requirements" to item 5 above, skip the following item and go on to page 8, Instructional Staff Evaluation Practices.

6. For students who do not meet stated admissions requirements, but are admitted under a special admissions policy, are the following courses provided? Fill in <u>one</u> oval for each option.

	No	Yes	
6a	0	0	Courses or sections offering remedial instruction in basic English.
6b	0	0	Courses or sections offering remedial instruction in basic mathematics.
6c	0	0	Special academic tutoring programs offering remedial instruction related to students' needs.

Rationale for items 5 and 6: If an institution has an essentially "open" admissions policy, then it should also have remedial services to assist students who may be underqualified. Failure to do so may be taking unfair advantage of underqualified students in the pretense of "giving them an opportunity."

Instructional Staff Evaluation Practices

Rationale for this topic: Unqualified and unmotivated staff provoke many student complaints; but the determination of staff qualifications and motivation, like the determination of quality of educational program, is problematic and beyond the scope of this form. However, there appear to be certain steps which can be taken to evaluate and improve instructional staff. All institutions should carry out such steps as a matter of institutional policy.

1. Is teaching competence (no matter how it is evaluated) included as one criterion in the formal salary and/or tenure and/or rank review policies of this institution? Fill in one oval.

	No	Yes	
1a	0	0	0 ← This institution has no formal salary/tenure/rank review policies.

2. Is teaching competence systematically evaluated by the following groups at this institution? Fill in one oval for each option.

	No	Yes	
2a	0	0	By administrative staff.
2b	0	0	By other faculty of the same department or program.
2c	0	0	By students.
2d	0	0	By graduates.
2e	0	0	By self-ratings.
2f		0	Other, please describe on the last page of the questionnaire.

If you filled in "no" to "by students" in item 2 above, skip the following two items and go on to page 10, Disclosure in Written Documents.

3. Are students evaluations of teaching faculty members conducted on a regular basis (for example, yearly, at the end of each course, etc.)? Fill in one oval.

	No	Yes
3a	0	0

If you filled in "no" to item 3 above, skip the following item and go on to page 10, Disclosure in Written Documents.

4. Does the system of evaluation of instructors by students include the following provisions? Fill in one oval for each option.

	No	Yes		
4a	0	0		Anonymous student responding.
4b	0	0		Objective student responding (for example, on machine scored answer sheets).
4c	0	0		Evaluations of all full-time faculty members.
				There are no part-time faculty members.
4d	0	0	0	Evaluations of all part-time faculty members (for example, adjunct faculty members).

Disclosure in Written Documents

Rationale for this topic: Lack of adequate disclosure by an institution can be intentional or unintentional. If it is intentional and students are misled as a result, the result is consumer fraud. Much more common are situations in which lack of adequate disclosure is unintentional, and students make important decisions based on faulty or no information. Student anger when the true facts become known is no less justified under these circumstances than under circumstances of intentional fraud. All institutions should, as a routine policy, disclose certain important facts, both to prospective enrollees and already enrolled students. Nor should students have to exert unreasonable effort to seek out these facts; they should be written clearly, in common English, and handed, free, to all.

Interviewer note: The items below do not ask whether particular conditions or services exist at the institution, but whether their existence or non-existence is adequately disclosed in public documents.

1. Does this institution disclose information on the following topics in its general catalog, bulletin, or basic public information document or a combination of these? Fill in one oval for each option, after reading the appropriate documents.

	No	Yes	
1a	0	0	Name and address of school.
1b	0	0	Date of publication of the document.
1c	0	0	School calendar including beginning and ending dates of classes and programs, holidays, and other dates of importance.
1d	0	0	A statement of institutional philosophy and program objectives.
1e	0	0	A brief description of the school's physical facilities.
1f	0	0	An accurate list of all courses actually offered, or all subject areas actually taught if separate courses do not exist.
1g	0	0	An indication of when specific required courses will not be offered.
1h	0	0	Educational content of each course, or of the program if separate courses do not exist.

	No	Yes	
1i	0	0	Number of hours of instruction in each course, or in the program if separate courses do not exist, and length of time in hours, weeks, or months normally required for its completion.
1j	0	0	An accurate listing of faculty who currently teach.
1k	0	0	An indication of the distinction between adjunct or part-time faculty and full-time faculty (if this distinction does not exist at this institution, fill in "yes").
1l	0	0	Policies and procedures regarding acceptability or non-acceptability of credits from other institutions.
1m	0	0	General acceptability or non-acceptability by other institutions of credits earned at this institution.
1n	0	0	Requirements for graduation.
1o	0	0	Statement of certificates or diplomas awarded upon graduation.
1p	0	0	Notice of <u>all</u> charges for which a student may be held responsible (if no charges exist at this institution, fill in "yes").
1q	0	0	Financial aid programs actually available to students, or instructions on how to obtain such information.
1r	0	0	Limitations on eligibility for financial aid programs, or instructions on how to obtain such information.
1s	0	0	Grading system.
			Policies relating to:
1t	0	0	Tardiness
1u	0	0	Absences
1v	0	0	Make-up work
1w	0	0	Student conduct
1x	0	0	Termination
1y	0	0	Re-entry after termination

2a. If there are any standard limitations on post-training employment opportunities for students at this institution (for example, medical or health requirements, professional licensing requirements, apprencticeships, age, experience, further training by employer, etc.), are these limitations disclosed in the basic public information document(s)? Fill in <u>one</u> oval.

	No	Yes	↓ There are no standard limitations on post-training employment opportunities for students at this institution.
2a1	0	0	0

2b. If this institution lacks specialized or professional course accreditation which is required for post-training employment of students, is this lack disclosed in the public information document(s)? Fill in one oval.

0 The lack of specialized accreditation is not disclosed.

0 The lack of specialized accreditation is disclosed.

0 Specialized or professional course accreditation is not required for post-training employment in any of the courses of study offered at this institution, or all courses requiring specialized accreditation are so accredited.

2c. Does this institution provide accurate descriptions of the availability and extent of the following student services in its basic public information document(s)? Fill in one oval for each option.

	No	Yes	No service of this type exists at this institution.	
2c	0	0	0	Job placement
2cd	0	0	0	Student counseling
2ce	0	0	0	Dining facilities (for example, a student cafeteria. Do not count vending machines.)
2cf	0	0	0	Housing facilities
2cg	0	0	0	Parking facilities

Note: Items 2h, 2i, and 2j, dealing with degree-granting practices, are omitted from this form.

3. Are increases in any student fees in excess of $25 currently planned to occur within the next year? Fill in one oval.

	No	Yes
3a	0	0

If you filled in "no" to item 3 above, skip item 4 and go on to item 5.

4. Are the planned fee increases disclosed in writing to all students and prospective enrollees to whom they might apply? Fill in one oval.

	No	Yes
4a	0	0

5. Does this institution make student loans, either directly from the institution or as a lender for one of the federal or state student loan programs? Fill in one oval.

	No	Yes
5a	0	0

If you filled in "no" to item 5 above, skip the following item and go on to page 14, Student Orientation Practices.

6. Do all applicants for student loans (excluding short-term or emergency loans) receive printed documents from the institution which disclose the following, before any repayment obligation begins? Fill in one oval for each option.

	No	Yes	
6a	0	0	The effective annual loan interest rate.
6b	0	0	Loan repayment obligations.
6c	0	0	The process for repayment of the loan.
6d	0	0	The length of time allowed for repayment.
6e	0	0	The procedure for renegotiating the repayment schedule for the loan or deferred fees.
6f	0	0	Procedures for deferment or cancellation of portions of the loan or deferred fees, if necessary.
6g	0	0	Procedures for loan or deferred fee collection which will be used in the event of failure to repay.

Student Orientation Practices

Rationale for this topic area: Institutions have a responsibility to engage in certain affirmative student orientation practices to insure that newly enrolled students are aware of their rights and responsibilities. The orientation should especially include presentations by students who have been enrolled previously, so that they can share their experiences and acquired knowledge of the practices and policies of the institution.

1. Does this institution conduct a program of orientation for incoming students? Fill in one oval.

	No	Yes
1a	0	0

If you filled in "no" to item 1 above, skip the following item and go on to page 15, Job Placement Services and Follow-Up of Graduates.

2. Does this student orientation include the following? Fill in one oval for each option.

	No	Yes	
2a	0	0	An orientation newsletter or student handbook.
2b	0	0	Oral presentations or written documents prepared by students who have attended the institution recently.
2c	0	0	Instructions on how and where to voice complaints and grievances.
2d	0	0	Instructions on how to obtain information on available student financial aid.

Job Placement Services and Follow-Up of Graduates

Rationale for this topic area: Two related topic areas are actually covered here. If institutions do not claim to offer placement assistance, it is of course not mandatory that they do so. If placement assistance is offered, it should consist of certain essential services lest it be nothing more than a shoddy sales gimmick. Regardless of whether or not placement assistance is offered, follow-through (or follow-up of graduates and alumni) is essential as a method for evaluating the relevance and effectiveness of an institution's educational programs. Sampling and new student follow-up techniques make such follow-through a possibility for all institutions.

1. Does this institution state that it offers job placement services or other placement assistance to students in finding jobs? Fill in one oval.

	No	Yes
1a	0	0

If you filled in "no" to item 1 above, skip item 2 and go on to item 3.

2. Does the placement assistance offered by this institution include the following aspects? Fill in one oval for each option.

	No	Yes	
2a	0	0	A fee for the assistance.
2b	0	0	Formal training in job-seeking and job-holding skills.
2c	0	0	Seeking out and/or contacting prospective employers.
2d	0	0	Making job interview appointments for individual students.
2e	0	0	Referral to a commercial placement service which charges a fee.
2f	0	0	Collation and distribution of "Help Wanted" ads from newspapers as the only placement assistance offered.
2g	0	0	Assistance in finding part-time jobs.
2h		0	Other, please describe in the space provided at the end of the form.

Rationale for item 2: Genuine placement assistance or service performs at least the minimal functions of job development (contacting prospective employers regarding possible openings), training in job seeking and maintenance skills, and scheduling interviews for students, for both part-time and full-time jobs. Any placement assistance or service which does not perform these functions is in danger of being a charade, and calling it "placement" is a potential abuse.

3. Does this institution systematically collect data on the employment success (however defined) of persons in its occupational or professional preparation programs? Fill in one oval for each option.

	No	Yes	This institution currently has no occupational or professional preparation students or graduates.	
3a	0	0	0	Former students who did not graduate.
3b	0	0	0	Recent graduates (within one year of graduation).
3c	0	0	0	Recent graduates (within five years of graduation).

Rationale for item 3: With the efficiency of modern sampling and follow-up techniques, even lack of a large budget is no excuse for not trying to collect some data on the ultimate desired outcome of occupational or professional preparation programs--employment success.

4. Does this institution systematically collect data on the numbers and characteristics of students who drop out of the school at the time they leave or soon thereafter? Fill in one oval for each option.

	No	Yes	
4a	0	0	For all students enrolled in occupational or professional preparation programs or majors.
4b	0	0	For all enrolled students regardless of program or major.

Recordkeeping Practices

Rationale for this topic: Institutions which do not adequately maintain student records in a central location make it extremely difficult for current and former students to access them when there is a need to do so. Moreover, if an institution should cease operations, lack of a record maintenance policy can cause great inconvenience and even abuse of current and former students, who are unable to secure necessary proof of their past education.

1. Are individual student records maintained which contain the following items? Fill in one oval for each option.

	No	Yes		
			↓	No fees are charged by this institution.
1a	0	0	0	Total fees paid by the student.
1b	0	0		Courses taken and completed or subject matter covered by the student.
			↓	No internships or supervised practice are offered by this institution.
1c	0	0	0	Internships or other forms of supervised professional practice.
1d	0	0		Academic credits, grades, or indicators of satisfactory progress earned by the student.
			↓	No financial aid is offered by this institution directly.
1e	0	0	0	Financial aid amounts, including loans received by the student directly from the institution, if any.
1f		0		Other, please describe in the space provided at the end of the form.

2. Does this institution have a written policy for maintaining, or arranging for maintenance of, individual student access to records for a period of at least two years in the event of a school closure or change of control? Fill in one oval.

	No	Yes
2a	0	0

Maintaining Stability of Instructional Staff

Rationale for this topic: One of the most disturbing educational experiences is the turnover of instructional staff during a course. Each turnover causes extreme disruption and loss of essential continuity. Furthermore, excessive staff instability is a probable indicator of deeper troubles in an institution.

1. During the previous calendar year, how many times was there an unscheduled, permanent change of instructor after instruction had begun (for reasons other than illness or death of original instructor)? Fill in the number; if none, enter as zero.

1a Number of times: _____

2. This represented what percentage of the total number of instructors teaching during that calendar year? Fill in the percentage; if none, enter as zero.

2a Percentage: _____

3. During the previous calendar year, did any unscheduled, permanent change of instructor occur in the same course or subject area twice or more often after instruction had begun? Fill in one oval.

	No	Yes
3a	0	0

Representation of Current Approved or Accredited Status

Rationale for this topic: Students should be accurately informed about the actual status of an institution or its programs with regard to state or veterans approval, private accreditation, and any pending legal actions. It is the responsibility of the institution to provide and not to misrepresent this information. Misrepresentation is a subtle abuse which may cause students to believe an institution has been evaluated and approved, when in fact it has not been.

1. Is this institution currently on suspension, probation, or some other form of limitation or sanction for noncompliance with designated standards, by any of the following government agencies? Fill in <u>one</u> oval for each option.

	No	Yes	
1a	0	0	A local government agency (for example, Consumer Protection Agency, District Attorney, etc.).
1b	0	0	A state government agency (for example, State Approving or Licensing Agency, Attorney General, etc.).
1c	0	0	A federal government agency (for example, Federal Trade Commission, Office of Guaranteed Student Loans/DHEW, etc.).

If you filled in "no" to all of the above options, skip item 2 and go on to item 3.

2. Are the facts of the above limitation(s) or sanction(s) publicly disclosed to enrolled students and prospective students? Fill in <u>one</u> oval for each option.

	No	Yes	
2a	0	0	In printed form to all enrolled students.
2b	0	0	In printed form to all prospective students.

3. Do the public representations of this institution clearly indicate (and distinguish between, where applicable) institutional accreditation, specialized or professional program accreditation, state VA-approving agency course approval, and state licensing and approval? Fill in one oval after reading the public information documents of the institution if possible.

	No	Yes	Not Applicable.
3a	0	0	0

Financial Stability

Rationale for this topic: As many regulatory bodies have discovered too late, it is very difficult to either measure or guard against financial instability in a postsecondary institution. However, certain practices are more likely than others to insure that institutions do not close down, leaving students with no recourse. Regulatory bodies should know about these practices in institutions for which they are responsible; consumers should also be aware of these practices.

1. Are the central financial records and reports of this institution regularly subjected to the following audits or inspections? Fill in <u>one</u> oval for each option.

	No	Yes	
1a	0	0	<u>Uncertified</u> audit by an accounting firm.
1b	0	0	<u>Certified</u> audit by an accounting firm.
1c	0	0	Inspection by a state regulatory or auditing agency.
1d	0	0	Inspection by a federal regulatory or auditing agency.

2. Is this a publicly-supported institution (that is, over 50% public funding)? Fill in <u>one</u> oval.

	No	Yes
2a	0	0

If you filled in "yes" to item 2 above, skip the following four items and go on to page 23, Occupational Instructional Programs.

3. Does this institution have an endowment, retained earnings fund, or other reserve of funds or income to pay operating expenses not covered by current student tuition receipts? Fill in <u>one</u> oval.

	No	Yes
3a	0	0

4. Do the financial reporting practices of this institution report uncollected tuition as assets, without indicating an offsetting liability? Fill in one oval after looking at a current financial statement, if possible.

	No	Yes
4a	0	0

5. Is this institution currently engaged in bankruptcy proceedings, or is there any serious possibility that it might enter into bankruptcy proceedings during the next 12 months? Fill in one oval.

	No	Yes
5a	0	0

If you filled in "no" to item 5 above, skip the following item and go on to page 23, Occupational Instructional Programs.

6. Does this institution publicly disclose information about bankruptcy proceedings that are underway or planned? Fill in one oval for each option.

	No	Yes	
6a	0	0	This information is disclosed to all enrolled students.
6b	0	0	This information is disclosed to all prospective enrollees.

Occupational Instructional Programs

Rationale for this topic: There is no intent in this section to gather indicators of the "quality" of an institution's instructional program. This is a complicated task better handled by the accreditation or approval process. The intent of this section is to gather descriptive indicators of institutional practices which are viewed as essential for the maintenance and improvement of quality. In the occupational/vocational program area, students (and employers) generally expect training to result in certain very specific skill outcomes. If the institution does not take definite steps to see that these outcomes are achieved in its graduates, it is in danger of malpractice. We have no definitive catalog of such steps (if we did, we would start a school); we have included practices about which there is general agreement.

1. Does this institution maintain and utilize advisory committee(s) on curriculum content? Fill in one oval for each option.

	No	Yes	
1a	O	O	For some of the occupational/professional preparation program areas offered at this institution.
1b	O	O	For all occupational/professional preparation program areas offered at this institution.

If you filled in "no" for both options to item 1 above, skip item 2 and go on to item 3.

Rationale for item 1: Institutions lacking such advisory bodies tend to insulate themselves and their curricula from current practices and technology in business, industry, and government, and in so doing they jeopardize the chances of their students for placement in jobs appropriate to the type of training which they have completed.

2. Do these committee(s) include representatives of potential employers? Fill in one oval for each option.

	No	Yes	
2a	O	O	For some of the occupational/professional preparation program areas offered at this institution.
2b	O	O	For all occupational/professional preparation program areas offered at this institution.

3. Do all of the occupational/professional preparation programs in this institution possess specialized/professional accreditation, if this is a requirement for the employment of graduates in those occupations or professions? Fill in one oval.

	No	Yes	
3a	0	0	0 — Specialized/professional accreditation is not required for any position in any occupation or profession for which this institution provides preparation.

4. Do all of the occupational/professional preparation programs in this institution provide sufficient training in the use of basic tools and equipment, if this is a requirement for the employment of graduates in those occupations or professions? Fill in one oval.

	No	Yes	
4a	0	0	0 — Training in the use of basic tools and equipment is not required for any position in any occupation or profession for which this institution provides preparation.

5. Do all of the occupational/professional preparation programs in this institution provide for internships and/or supervised practice on the job, if this is a requirement for the employment of graduates in those occupations or professions? Fill in one oval.

	No	Yes	
5a	0	0	0 — Internships and/or supervised practice on the job are not required for any position in any occupation or profession for which this institution provides preparation.

6. Do all of the occupational/professional preparation programs in this institution provide for internships and/or supervised practice in simulated job situations, if this is a requirement for the employment of graduates in those occupations or professions? Fill in one oval.

	No	Yes	
6a	0	0	0 — Internships and/or supervised practice in simulated job situations are not required for any position in any occupation or profession for which this institution provides preparation.

7. Do <u>all</u> of the occupational/professional preparation programs in this institution provide for <u>instruction on topics necessary for state or professional certification in this state</u>, if such certification is a requirement for the employment of graduates in those occupations or professions? Fill in <u>one</u> oval.

	No	Yes	
7a	0	0	0 State or professional certification in this state is not <u>required</u> for any position in <u>any</u> occupation or profession for which this institution provides preparation.

8. Does this institution require reviews of the relevance and timeliness of <u>all</u> of its occupational/professional preparation curricula once every two years or more frequently? Fill in <u>one</u> oval.

	No	Yes
8a	0	0

Occupational Instructional Equipment and Facilities

Rationale for this topic area: Some schools impose outdated or improperly functioning equipment on their students. This affects how adequately graduates are prepared for employment once they complete their instructional programs. Some schools start new programs but fail to purchase the amount and type of equipment needed to run the program. Both types of practice are abusive.

1. Does this institution utilize advisory committees on instructional equipment and facilities? Fill in <u>one</u> oval.

	No	Yes
1a	0	0

If you filled in "no" to item 1 above, skip item 2 and go on to item 3.

2. Do these advisory committees include representatives of potential employers? Fill in <u>one</u> oval for each option.

	No	Yes	
2a	0	0	For <u>some</u> of the occupational/professional preparation program areas offered at this institution.
2b	0	0	For <u>all</u> occupational/professional preparation program areas offered at this institution.

3. Does this institution annually expend sufficient funds for replacing worn or outdated instructional equipment (including lab and other non-classroom equipment)? Fill in <u>one</u> oval.

	No	Yes
3a	0	0

4. Does this institution annually expend funds for new instructional equipment (including lab and other non-classroom equipment) sufficient to meet projected program needs? Fill in <u>one</u> oval.

	No	Yes
4a	0	0

Additional Comments

Please write additional comments in the space below. If you are commenting on specific items, be sure to include the section and item number.

Section and Item Number	Comment

APPENDIX C

Modifications to Occupational Training
Institutional Report Form for Postsecondary
Degree-Granting Institutions/Programs

1. The following items are added to the section on Disclosure in Written Documents, on page 12.

   Does this institution provide accurate descriptions of the following institutional conditions or procedures regarding the award of degrees?

	Yes	No		
				No state agency exists for this purpose.
2h	0	0	0	Recognition by state agency as meeting established educational standards for granting degrees.
2i	0	0		Scope and sequence of required courses or subject areas in each degree program.
				There is no transfer between departments and/or colleges.
2j	0	0	0	Policies and procedures regarding transfer between departments and/or colleges within the institution.

2. The sections on Occupational Instruction Programs and Occupational Instruction Equipment and Facilities (pages 23-26) are removed.

APPENDIX D

IRF Coding, Editing and Weighting Specifications

Field Name	Length	Raw Line/Bytes	Merged Bytes	Coding and Editing
School ID	11	1/1-11	1-11	bytes 1-2 state city code (geographical region) 01 = San Francisco 02 = Los Angeles 03 = Minneapolis 04 = St. Paul 05 = Kansas City 06 = St. Louis byte 3 ownership status 1 = public 2 = private, non-profit, non-religious affiliated 3 = private, non-profit, religious affiliated 4 = proprietary byte 4 school type 1 = occupational/vocational programs only 2 = 2 year degree-granting with some occupational/vocational programs 3 = 2 year degree-granting with no occupational/vocational programs 4 = 4 year degree-granting (may or may not include occupational/vocational programs)
				byte 5 school size 1 = enrolled first year students < 25 2 = enrolled first year students 26-100 3 = enrolled first year students 101-250 4 = enrolled first year students 251-1000 5 = enrolled first year students >1000 byte 6-10 sequential numeric code (00001-nnnnn) unique for each school byte 11 data source code 1 = data obtained from public documents only 2 = data obtained from documents plus personal interview 3 = data validity checked by second interviewer
Topic 1 - Refund Policies and Procedures				yes = '1', no = '0', no response = '9'
Items 1a-1e	5	1/12-16	12-16	-if none are marked, code '9' to all 2a-4f and go to topic 2 -if all 1a-1e are NO, code '8' to all 2a-4f and go to topic 2 -if all 1a-1e are NO or no response, code '9' to all 2a-4f and go to topic 2
Item 2a	1	1/17	17	-if no response, code '9' to all 3a-4f and go to topic 2 -if NO, code '8' to all 3a-4f and go to topic 2
Items 3a-3d	4	1/18-21	18-21	-code as marked
Items 4a-4f	6	1/22-27	22-27	-code as marked
Topic 2 - Advertising Practices				yes = '1', no = '0', no response = '9'
Items 1a-1d	4	1/28-31	28-31	-code as marked
Items 2a-2f	6	1/32-37	32-37	-code as marked
Items 3a-3b	2	1/38-39	38-39	-no non-response allowed unless both are non-response, else code a single non-response as NO('0')
Topic 3 - Admissions Policies				yes = '1', no = '0', no response = '9'
Item 1a	1	1/40	40	-if no response, code '9' to all 2a-2c; go to 3a -if NO, code '8' to 2a-2c; go to 3a
Items 2a-2c	3	1/41-43	41-43	-code as marked
Item 3a	1	1/44	44	-if no response, code '9' to 4a-4c; go to 5a -if NO, code '8' to 4a-4c; go to 5a
Items 4a-4c	3	1/45-47	45-47	-code as marked
Item 5a	1	1/48	48	-if "no stated admissions policy," code '8' to 6a-6c and go to topic 4 -if no response, code '9' to 6a-6c, go to topic 4 -if NO, code '8' to 6a-6c and go to topic 4
Items 6a-6c	3	1/49-51	49-51	-code as marked

Weighting - Item Responses

Note: yes, no, and '8' (directed nonresponse) are in n and weight 1a-1e not weighted

2a NO = 2 plus 1 for each YES option above two in 1a-1e; YES = 0

	NO	YES	8		NO	YES	8
3a(1)	2	0	0	4c(7)	1	0	0
3b(2)	2	0	0	4d(8)	0	0	0
3c(3)	1	0	0	4e(9)	0	1	0
3d(4)	0	0	0	4f(10)	1	0	0
4a(5)	2	0	0				
4b(6)	1	0	0				

	YES	NO	8		YES	NO	8
1a(1)	2	0	0	2b(6)	1	0	0
1b(2)	1	0	0	2c(7)	1	0	0
1c(3)	1	0	0	2d(8)	1	0	0
1d(4)	2	0	0	2e(9)	1	0	0
2a(5)	2	0	0	2f(10)	1	0	0

3a and 3b treated as one item
NO,NO = 3 YES,YES = 0
YES,NO = 1 NO,YES = 0

	YES	NO	8
1a(1)	1	0	0
2a(2)	3	0	0
2b(3)	2	0	0
2c(4)	0	0	0
3a(5)	0	3	0
4a(6)	0	1	0
4b(7)	0	1	0
4c(8)	0	1	0
5a(9)	not weighted		
6a(10)	0	1	0
6b(11)	0	1	0
6c(12)	0	1	0

Field Name	Length	Raw Line/Bytes	Merged Bytes	Coding and Editing	Weighting - Item Responses
Topic 4 - Instructional Staff				yes = '1', no = '0', no response = '9'	NO YES 8 / 1a(1) 3 0 0 / 2a,2b,2d,2e - treat as one item - less than 3 NO's = 0, three NO's = 1, four NO's = 2 / 2c(4) 2 0 0 / 2f(7) omit from weighting / 3a(8) 3 0 0 / 4a(9) 1 0 0 / 4b(10) 1 0 0 / 4c(11) 1 0 0 / 4d(12) 1 0 0
Item 1a	1	1/52	52	-if "no formal review," code '8' to 1a	
Items 2a-2f	6	1/53-58	53-58	-if 2c is no response, code '9' to 3a-4d, go to topic 5	
				-code 2f as '9' (omit from weights)	
				-if 2c is NO, code '8' to 3a-4d, go to topic 5	
Item 3a	1	1/59	59	-if no response, code '9' to 4a-4d, go to topic 5	
				-if NO, code '8' to 4a-4d, go to topic 5	
Items 4a-4d	4	1/60-63	60-63	-code as marked	
Topic 5 - Written Disclosure				yes = '1', no = '0', no response = '9'	NO YES 8 / 1a-1y .5 0 0 / 2a-2b(1-2) 1 0 0 / 2c-2j(3-10) .5 0 0 / 3a(11) not weighted / 4a(12) 2 0 0 / 5a(13) not weighted / 6a-6g(14-20) 1 0 0
Items 1a-1y	25	1/64-88	64-88	-code as marked	
Items 2a-2j	10	1/89-98	89-98	-code 'do not exist' as '8' in 2a-2j	
Item 3a	1	1/99	99	-if no response, code '9' to 4a and go to 5a	
				-if NO, code '8' to 4a and go to 5a	
Item 4a	1	1/100	100	-code as marked	
Item 5a	1	1/101	101	-if no response, code '9' to all 6a-6g, go to topic 6	
				-if NO, code '8' to 6a-6g, go to topic 6	
Items 6a-6g	7	1/102-108	102-108	-code as marked	
Topic 6 - Student Orientation				yes = '1', no = '0', no response = '9'	NO YES 8 / 1a(1) 3 0 0 / 2a-2d(2-5) 1 0 0
Item 1a	1	1/109	109	-if no response, code '9' to 2a-2d, go to topic 7	
				-if NO, code '8' to 2a-2d, go to topic 7	
Items 2a-2d	4	1/110-113	110-113	-code as marked	
Filler	6	1/114-119	does not exist	leave blank	
Record ID	1	1/120	does not exist	code as '1'	
School ID	11	2/1-11	does not exist	code as in record '1' above	
Topic 7 - Job Placement				yes = '1', no = '0', no response = '9'	NO YES 8 / 1a(1) not weighted / 2a(2) 0 1 0 / 2b(3) 1 0 0 / 2c(4) 1 0 0 / 2d(5) 1 0 0 / 2e(6) 0 1 0 / 2f(7) 0 1 0 / 2g(8) 1 0 0 / 2h(9) not weighted / 3a(10) 1 0 0 / 3b(11) 2 0 0 / 3c(12) 1 0 0 / 4a and 4b treated as one item / NO,NO = 2; YES,NO = 1; YES,YES = 0; NO,YES = 0
Item 1a	1	2/12	114	-if NO, code '8' to 2a-2h, go to 3a	
				-if no response, code '9' to 2a-2h, go to 3a	
Items 2a-2h	8	2/13-20	115-122	-code as marked; code 2h as '9'	
Items 3a-3c	3	2/21-23	123-125	-if 'no students', code '8'	
Items 4a-4b	2	2/24-25	126-127	-code as marked	
Topic 8 - Recordkeeping Practices				yes = '1', no = '0', no response = '9'	NO YES 8 / 1a(1) 1 0 0 / 1b(2) 1 0 0 / 1c(3) 1 0 0 / 1d(4) 1 0 0 / 1e(5) 1 0 0 / 1f(6) not weighted / 2a(7) 3 0 0
Items 1a-1f	6	2/26-31	128-133	-code as marked; code 1f as '9'	
Item 2a	1	2/32	134	-code as marked	
Topic 9 - Stability of Instructional Staff				yes = '1', no = '0', no response = '9'	1a - not weighted / 2a - 0% = 0 2-5% = 2 / 1-2% = 1 > 5% = 3 / 3a - NO = 0 YES = 2 8 = 0
Item 1a	3	2/33-35	135-137	-code in actual number 000 ≤ N ≤ 989	
				-code '999' if no response	
Item 2a	3	2/36-38	138-140	-code actual percentage 000 ≤ P ≤ 100	
				-code '999' if no response	
Item 3a	1	2/39	141	-code as marked	
Topic 10 - Representation of Status				yes = '1', no = '0', no response = '9'	NO YES 8 / 1a(1) 0 1 0 / 1b(2) 0 1 0 / 1c(3) 0 1 0 / 2a(4) 2 0 0 / 2b(5) 1 0 0 / 3a(6) 3 0 0
Items 1a-1c	3	2/40-42	142-144	-if no response to all 1a-1c, code '9' to 2a-2b, go to 3a	
				-if NO to all 1a-1c, code '8' to 2a-2b, go to 3a	
				-if any YES, go to 2a	
				-else code '9' to 2a-2b and go to 3a	
Items 2a-2b	2	2/43-44	145-146	-code as marked	
Items 3a	1	2/45	147	-code as marked	

Field Name	Length	Raw Line/Bytes	Merged Bytes	Coding and Editing	Weighting - Item Responses
Topic 11 - Financial Stability				yes = '1', no = '0', no response = '9'	treat 1a & 1b as one item, 1c & 1d as one item: NO,NO = 2; YES,NO = 1; YES,YES = 0; NO,YES = 0
Items 1a-1d	4	2/46-49	148-151	-code as marked	
Item 2a	1	2/50	152	-if YES, code '8' to 3a-6b, go to topic 12	
Item 3a	1	2/51	153	-code as marked	
Item 4a	1	2/52	154	-code as marked	
Item 5a	1	2/53	155	-if no response, code '9' to 6a-6b, go to topic 12 -if NO, code '8' to 6a-6b, go to topic 12	
Items 6a-6b	2	2/54-55	156-157	-code as marked	
Topic 12 - Instructional Programs				yes = '1', no = '0', no response = '9', not required = '8'	treat 1a & 1b as one item: NO,NO = 3; YES,NO = 1; YES,YES = 0; NO,YES = 0 treat 2a & 2b as one item: NO,NO = 2; YES,NO = 1; YES,YES = 0; NO,YES = 0
Items 1a-1b	2	2/56-57	158-159	-if no response to both, code '9' to 2a-2b, go to 3a -if NO to both, code '8' to 2a-2b, go to 3a -if NO and no response, code '9' to 2a-2b, go to 3a	
Items 2a-2b	2	2/58-59	160-161	-code as marked	
Item 3a	1	2/60	162	-code as marked	
Item 4a	1	2/61	163	-code as marked	
Item 5a	1	2/62	164	-code as marked	
Item 6a	1	2/63	165	-code as marked	
Item 7a	1	2/64	166	-code as marked	
Item 8a	1	2/65	167	-code as marked	
Topic 13 - Instructional Facilities				yes = '1', no = '0', no response = '9'	treat 2a & 2b as one item: NO,NO = 2; YES,NO = 1; YES,YES = 0; NO,YES = 0
Item 1a	1	2/66	168	-if no response, code '9' to 2a-2b, go to 3a -if NO, code '8' to 2a-2b, go to 3a	
Items 2a-2b	2	2/67-68	169-170	-code as marked	
Item 3a	1	2/69	171	-code as marked	
Item 4a	1	2/70	172	-code as marked	

	NO	YES	8
2a(1)	not weighted		
3a(2)	2	0	0
4a(3)	0	2	0
5a(4)	0	3	0
6a(5)	2	0	0
6b(6)	2	0	0

	NO	YES	8
3a(1)	2	0	0
4a(2)	2	0	0
5a(3)	2	0	0
6a(4)	2	0	0
7a(5)	2	0	0
8a(6)	2	0	0

	NO	YES	8
1a(1)	2	0	0
3a(2)	2	0	0
4a(3)	2	0	0

APPENDIX E

IRF Weighting Program

SOURCE LISTING

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/*   IWEIGHT - WEIGHT THE ITEMS ON THE IRF'S TO GET TOPIC SCORES     */  80.
/*****************************************************************     90.
/*****************************************************************     100.
/*                                                               **     110.
/* IWEIGHT: THIS PROGRAM IS USED FOR BOTH DEGREE AND NON-DEGREE  **     120.
/*          INSTITUTIONS TO WEIGHT EACH ITEM ON THE IRF.  FOR EACH **   130.
/*          TOPIC A TOPIC SCORE IS DEFINED AS THE SUM OF THE WEIGHTS**  140.
/*          DIVIDED BY THE N OF REAL RESPONSES.  A REAL RESPONSE  **    150.
/*          IS ONE THAT IS ANSWERED EITHER YES, NO, OR A DIRECTED **    160.
/*          NON-RESPONSE (CODED AS '8').  NOT A MISSING DATA OF THE **  170.
/*          VARIETY THAT IS CODED '9'.                            **    180.
/*          SPLIT HALF SCORES ARE ALSO DERIVED FOR EACH TOPIC AREA **   190.
/*          AND AN OVERALL IRF SCORE IS DEFINED AS THE SUM OF THE  **   200.
/*          TOPIC WEIGHTS DIVIDED BY THE NUMBER OF TOPICS FOR WHICH **  210.
/*          THERE WAS A NON-ZERO (REAL) N.                        **    220.
/*          NOTE: IF THERE ARE NO VALID ITEMS FOR ANY TOPIC OR FOR **   230.
/*                ALL TOPICS, THE RELATED SCORES(TOTAL AND SPLIT  **    240.
/*                HALVES) WILL BE ALL 9'S.                        **    250.
/*          AN OUTPUT FILE WITH THE ORIGINAL ITEM DATA,TOPIC AND IRF**  260.
/*          WEIGHTS,N'S,SPLIT-HALF WEIGHTS AND N'S,TOPIC AND IRF  **    270.
/*          SCORES IS DEVELOPED WHICH WILL BE MERGED WITH COMPOSITED**  280.
/*          ESQ DATA TO FORM AN ANALYSIS FILE FOR PROJECT 52801    **   290.
/*                                                                **    300.
/* AUTHOR: NAOMI LEE BLOOM                    DATE: 12 MAY 1976  **     310.
/*                                          REVISED: 17 SEPT 1976 **    320.
/*                                                                **    330.
/*****************************************************************     340.
/*****************************************************************/    350.
                                                                        360.
1       1  IWEIGHT: PROC OPTIONS (MAIN);                               370.
                                                                        380.
2       1  0    DCL MERGOUT FILE INPUT RECORD,                         390.
                 WEIGOUT FILE OUTPUT RECORD;                            400.
                                                                        410.
3       1  0    DCL (IN_CNT,OUT_CNT) PIC '999999' INIT (0);            420.
                                                                        430.
                                                                        440.
4       1  0    DCL P POINTER STATIC;                                  450.
5       1  0    DCL 1 MERG_REC BASED (P),                              460.
                    5 SID              CHAR(11),     /* BYTES 1-11      */ 470.
                    5 TOPIC1(18)       PIC '9',      /* BYTES 12-27 REFUND */ 480.
                    5 TOPIC2(12)       PIC '9',      /* BYTES 28-39 ADVERT. */ 490.
                    5 TOPIC3(12)       PIC '9',      /* BYTES 40-51 ADMISSION*/ 500.
                    5 TOPIC4(12)       PIC '9',      /* BYTES 52-63 STAFF  */ 510.
                    5 TOPIC5(45)       PIC '9',      /* BYTES 64-108 DISCLOS.*/ 520.
                    5 TOPIC6(5)        PIC '9',      /* BYTES 109-113 ORIENT.*/ 530.
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                    5 TOPIC7(14)          PIC '9',       /* BYTES 114-127 JOBS    */   540.
                    5 TOPIC8(7)           PIC '9',       /* BYTES 128-134 RECORDS*/   550.
                    5 TOPIC9(7)           PIC '9',       /* BYTES 135-141 STABIL.*/   560.
                    5 TOPIC10(6)          PIC '9',       /* BYTES 142-147 STATUS */   570.
                    5 TOPIC11(10)         PIC '9',       /* BYTES 148-157 FINANC */   580.
                    5 TOPIC12(10)         PIC '9',       /* BYTES 158-167 PROGRAM*/   590.
                    5 TOPIC13(5)          PIC '9',       /* BYTES 168-172 FACILIT*/   600.
                    5 STATWATF            CHAR(8),       /* BYTES 173-180 RATING */   610.
                    5 NO_STUDENTS         PIC'9999',     /* BYTES 181-184 STUDS  */   620.
                    5 ACCRED              CHAR(1),       /* BYTE 185 ACCREDITA.  */   630.
                    5 AGE                 CHAR(1);       /* BYTE 186 AGE OF SCH. */   640.
                                                                                      650.
A   1  0        DCL 1 MERG_REC_OVLAY BASED (P),                                       660.
                    5 MID                 CHAR(11),                                   670.
                    5 TOPIC1_STR          CHAR(16),                                   680.
                    5 TOPIC2_STR          CHAR(12),                                   690.
                    5 TOPIC3_STR          CHAR(12),                                   700.
                    5 TOPIC4_STR          CHAR(12),                                   710.
                    5 TOPIC5_STR          CHAR(45),                                   720.
                    5 TOPIC6_STR          CHAR(5),                                    730.
                    5 TOPIC7_STR          CHAR(14),                                   740.
                    5 TOPIC8_STR          CHAR(7),                                    750.
                    5 TOPIC9_STR          CHAR(7),                                    760.
                    5 TOPIC10_STR         CHAR(6),                                    770.
                    5 TOPIC11_STR         CHAR(10),                                   780.
                    5 TOPIC12_STR         CHAR(10),                                   790.
                    5 TOPIC13_STR         CHAR(5),                                    800.
                    5 STATWATF            CHAR(8);                                    810.
                                                                                      820.
7   1  0        DCL 1 TOTALS STATIC,                                                  830.
                    5 TARRAY(4),                                                      840.
                        10 TWGT_SUM           FIXED(5,2),                          850.
                        10 T_N                FIXED(3,0),                          860.
                        10 T_SCORE            FIXED(6,0);                          870.
                  /* TARRAY(1) = SPLIT_HALF_A          TARRAY(3) = TOPIC      */   880.
                  /* TARRAY(2) = SPLIT_HALF_B          TARRAY(4) = IRF        */   890.
                                                                                      900.
F   1  0        DCL 1 WGHT_REC STATIC,  /* LRECL= 816          */                     910.
                    5 MID                 CHAR(11),      /* BYTES 1-11            */  920.
                    5 TOPIC1(18)          PIC '9',       /* BYTES 12-27 REFUND    */  930.
                    5 TOPIC2(12)          PIC '9',       /* BYTES 28-39 ADVERT.   */  940.
                    5 TOPIC3(12)          PIC '9',       /* BYTES 40-51 ADMISSION*/   950.
                    5 TOPIC4(12)          PIC '9',       /* BYTES 52-63 STAFF     */  960.
                    5 TOPIC5(45)          PIC '9',       /* BYTES 64-108 DISCLOS.*/   970.
                    5 TOPIC6(5)           PIC '9',       /* BYTES 109-113 ORIENT.*/   980.
                    5 TOPIC7(14)          PIC '9',       /* BYTES 114-127 JOBS    */  990.
                    5 TOPIC8(7)           PIC '9',       /* BYTES 128-134 RECORDS*/   1000.
                    5 TOPIC9(7)           PIC '9',       /* BYTES 135-141 STABIL.*/   1010.
                    5 TOPIC10(6)          PIC '9',       /* BYTES 142-147 STATUS */   1020.
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                    5 TOPIC11(10)        PIC '9',       /* BYTES 148-157 FINANC */  1030.
                    5 TOPIC12(10)        PIC '9',       /* BYTES 158-167 PROGRAM*/  1040.
                    5 TOPIC13(5)         PIC '9',       /* BYTES 168-172 FACILIT*/  1050.
                    5 STATRATE           CHAR(8),       /* BYTES 173-180 RATING */  1060.
                    5 NO_STUDENTS        PIC'9999',     /* BYTES 181-184 STUDS  */  1070.
                    5 ACCRED             CHAR(1),       /* BYTE 185 ACCREDITA.  */  1080.
                    5 AGE                CHAR(1),       /* BYTE 186 AGE OF SCH. */  1090.
                    5 TOPIC_TOTALS(13),                 /* ONE PER TOPIC AREA   */  1100.
                      10 TTARRAY(3), /* SPLITA,SPLITB,TOPIC IN THAT ORDER   */  1110.
                           15 WGT_SUM     PIC '9999V99',                          1120.
                           15 N           PIC '999',                              1130.
                           15 SCORE       PIC '999999V',                          1140.
                    5 IRF_WGT_SUM        PIC '9999V99',                          1150.
                    5 IRF_N              PIC '999',                              1160.
                    5 IRF_SCORE          PIC '999999V',                          1170.
                    5 IRFA_WGT_SUM       PIC '9999V99',                          1180.
                    5 IRFA_N             PIC '999',                              1190.
                    5 IRFA_SCORE         PIC '999999V',                          1200.
                    5 IRFB_WGT_SUM       PIC '9999V99',                          1210.
                    5 IRFB_N             PIC '999',                              1220.
                    5 IRFB_SCORE         PIC '999999V';                          1230.
                                                                                 1240.
0   1   0       DCL WGTS(13,3,12)   FIXED(3,1) STATIC                           1250.
                    INIT  (2,2,1,0,2,1,1,0,0,1,0,0,                              1260.
                           0,0,0,0,0,0,0,0,0,1,0,0,                              1270.
                           0,0,0,0,0,0,0,0,0,0,0,0,                              1280.
                           0,0,0,0,0,0,0,0,0,0,0,0,                              1290.
                           2,1,1,2,2,1,1,1,1,1,0,0,                              1300.
                           0,0,0,0,0,0,0,0,0,0,0,0,                              1310.
                           0,0,0,0,3,1,1,1,0,1,1,1,                              1320.
                           1,3,2,0,0,0,0,0,0,0,0,0,                              1330.
                           0,0,0,0,0,0,0,0,0,0,0,0,                              1340.
                           3,0,0,2,0,0,3,1,1,1,1,1,                              1350.
                           0,0,0,0,0,0,0,0,0,0,0,0,                              1360.
                           0,0,0,0,0,0,0,0,0,0,0,0,                              1370.
                           1,1,.5,.5,.5,.5,.5,.5,.5,.5,0,2,                      1380.
                           0,0,0,0,0,0,0,0,0,0,0,0,                              1390.
                           0,0,0,0,0,0,0,0,0,0,0,0,                              1400.
                           3,1,1,1,1,0,0,0,0,0,0,0,                              1410.
                           0,0,0,0,0,0,0,0,0,0,0,0,                              1420.
                           0,0,0,0,0,0,0,0,0,0,0,0,                              1430.
                           0,0,1,1,1,0,0,1,0,1,2,1,                              1440.
                           0,1,0,0,0,1,1,0,0,0,0,0,                              1450.
                           0,0,0,0,0,0,0,0,0,0,0,0,                              1460.
                           1,1,1,1,1,0,3,0,0,0,0,0,                              1470.
                           0,0,0,0,0,0,0,0,0,0,0,0,                              1480.
                           0,0,0,0,0,0,0,0,0,0,0,0,                              1490.
                           0,0,0,0,0,0,0,0,0,0,0,0,                              1500.
                           0,0,0,0,0,0,0,0,0,0,0,0,                              1510.
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                        0,0,0,0,0,0,0,0,0,0,0,0,                                1520.
                        0,0,0,2,1,3,0,0,0,0,0,0,                                1530.
                        1,1,1,0,0,0,0,0,0,0,0,0,                                1540.
                        0,0,0,0,0,0,0,0,0,0,0,0,                                1550.
                        0,2,0,0,2,2,0,0,0,0,0,0,                                1560.
                        0,0,2,3,0,0,0,0,0,0,0,0,                                1570.
                        0,0,0,0,0,0,0,0,0,0,0,0,                                1580.
                        2,2,2,2,2,2,0,0,0,0,0,0,                                1590.
                        0,0,0,0,0,0,0,0,0,0,0,0,                                1600.
                        0,0,0,0,0,0,0,0,0,0,0,0,                                1610.
                        2,0,0,2,2,0,0,0,0,0,0,0,                                1620.
                        0,0,0,0,0,0,0,0,0,0,0,0,                                1630.
                        0,0,0,0,0,0,0,0,0,0,0,0);                               1640.
                   /*************************************************************/ 1650.
                   /*************************************************************/ 1660.
                   /* THIS TABLE IS ORGANIZED AS FOLLOWS:                       */ 1670.
                   /*         FIRST DIMENSION(13) = TOPIC AREAS                 */ 1680.
                   /*         SECOND DIMENSION(3) = ANSWERS THAT ARE            */ 1690.
                   /*             COUNTED AS REAL I.E. NO=1,YES=2,'B'=3         */ 1700.
                   /*             SUBSCRIPTED BY J WITHIN CODE.                 */ 1710.
                   /*         THIRD DIMENSION(12) = ITEMS WITHIN TOPIC          */ 1720.
                   /*************************************************************/ 1730.
                   /*************************************************************/ 1740.
                                                                                   1750.
10   1  0        ON ENDFILE(MFWGDAT) GO TO CLOSE_FILES;                          1760.
                                                                                   1770.
11   1  0        OPEN FILE(MFRGDAT), FILE(WGHTDAT);                              1780.
12   1  0        PUT SKIP(2) EDIT ('ALL FILES OPENED') (X(10),A);                1790.
                                                                                   1800.
13   1  0    READ_MFWGDAT:                                                       1810.
               READ FILE (MFWGDAT) SET (P);                                        1820.
14   1  0        IN_CNT = IN_CNT + 1;                                            1830.
15   1  0        DO I = 1 TO 6;          /* RESET TOTALS AWAY          */         1840.
16   1  1           TOT_SUM(I) = 0;                                              1850.
17   1  1           T_WGT(I) = 0;                                                1860.
18   1  1           T_SCORE(I) = 0;                                              1870.
19   1  1        END;                                                            1880.
                   /*      RESET TOTAL FIELDS IN OUTPUT RECORD                */ 1890.
20   1  0        TRF_WGT_SUM = 0;                                                1900.
21   1  0        TRF_N = 0;                                                      1910.
22   1  0        TRF_SCORE = 0;                                                  1920.
23   1  0        TRFA_WGT_SUM = 0;                                               1930.
24   1  0        TRFA_N = 0;                                                     1940.
25   1  0        TRFA_SCORE = 0;                                                 1950.
26   1  0        TRFM_WGT_SUM = 0;                                               1960.
27   1  0        TRFM_N = 0;                                                     1970.
28   1  0        TRFM_SCORE = 0;                                                 1980.
29   1  0        DO I = 1 TO 13;                                                 1990.
30   1  1           DO J = 1 TO 3;                                               2000.
```

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                    WGT_SUM(I,J) = 0;                                          2010.
                    N(I,J) = 0;                                                2020.
                    SCORE(I,J) = 0;                                            2030.
                END;                                                           2040.
            END;                                                               2050.
            WGHT_REC = MERG_REC, BY NAME;                                      2060.
            /* NOTE: IN EACH ITEM, 1=YES, 0=NO, 8=DIRECTED NON-RESPONSE    */ 2070.
            /*       AND 9=MISSING DATA(NOT INCLUDED IN N)                 */ 2080.
                                                                               2090.
        /*  PROCESS TOPIC1 - REFUND POLICIES                                */ 2100.
            /* COUNT YES'S IN 1A - 1F     */                                  2110.
            J = 0;    /* WHERE J IS THE NUMBER OF YES'S     */                2120.
            DO I = 1 TO 5;       /* WHERE I = NO. OF ITEMS IN 1A-1E  */        2130.
                IF MERG_REC.TOPIC1(I) = 1 THEN J = J + 1;                      2140.
            END;                                                               2150.
            K = 1;   /* K IS USED THROUGHOUT AS THE SPLIT HALF INDICATOR */    2160.
            /* PROCESS ITEM 2A                                             */ 2170.
            IF MERG_REC.TOPIC1(K) = 1 | MERG_REC.TOPIC1(6) = 8 THEN DO;        2180.
                T_N(3) = T_N(3) + 1;                                           2190.
                T_N(K) = T_N(K) + 1;                                           2200.
                K = K + 1;                                                     2210.
                IF K > 2 THEN K = 1;                                           2220.
                /* WEIGHT = 0 FOR YES OR DIRECTED NON-RESPONSE(K)          */ 2230.
                END;                                                           2240.
            ELSE IF MERG_REC.TOPIC1(6) = 0 THEN DO;                            2250.
                T_N(3) = T_N(3) + 1;                                           2260.
                TWGT_SUM(3) = TWGT_SUM(3) + 2 * J;                             2270.
                T_N(K) = T_N(K) + 1;                                           2280.
                TWGT_SUM(K) = TWGT_SUM(K) + 2 * J;                             2290.
                K = K + 1;                                                     2300.
                IF K > 2 THEN K = 1;                                           2310.
                END;                                                           2320.
            DO I = 1 TO 10;      /* PROCESS ITEMS 3A-4F                    */ 2330.
                IF MERG_REC.TOPIC1(I+6) ^= 9 THEN DO;                          2340.
                    IF MERG_REC.TOPIC1(I+6) = K THEN J = 3;                    2350.
                        ELSE J = MERG_REC.TOPIC1(I+6) + 1;                     2360.
                    T_N(3) = T_N(3) + 1;                                       2370.
                    T_N(K) = T_N(K) + 1;                                       2380.
                    TWGT_SUM(3) = TWGT_SUM(3) + WGTS(I,J,1);                   2390.
                    TWGT_SUM(K) = TWGT_SUM(K) + WGTS(I,J,1);                   2400.
                    K = K + 1;                                                 2410.
                    IF K > 2 THEN K = 1;                                       2420.
                END;                                                           2430.
            END;                                                               2440.
                                                                               2450.
        /*  FINISH TOPIC1          */                                         2460.
            DO I = 1 TO 3;                                                     2470.
                IF T_N(I) > 0 THEN DO;                                         2480.
                    T_SCORE(I)=((TWGT_SUM(I)/T_N(I)) * .005) * 1000;           2490.
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 71   1  2          END;                                                          2500.
 72   1  1          ELSE T_SCORE(I) = 9999999;                                    2510.
 73   1  1          WGT_SUM(1,I) = TWGT_SUM(I);                                   2520.
 74   1  1          N(1,I)       = T_N(I);                                        2530.
 75   1  1          SCORE(1,I)   = T_SCORE(I);                                    2540.
 76   1  1          TWGT_SUM(I)  = 0;                                             2550.
 77   1  1          T_N(I)       = 0;                                             2560.
 78   1  1          T_SCORE(I)   = 0;                                             2570.
 79   1  1      END;                                                              2580.
                                                                                  2590.
               /* PROCESS TOPIC2 - ADVERTISING                              */    2600.
 80   1  0      K = 1;          /* SPLIT HALF INDICATOR                      */    2610.
 81   1  0      DO I = 1 TO 10;     /* PROCESS ITEMS 1A-2F                   */    2620.
 82   1  1          IF MERG_REC.TOPIC2(I) ¬= 9 THEN DO;                           2630.
 83   1  2              IF MERG_REC.TOPIC2(I) = 8 THEN J = 3;                     2640.
 84   1  2                  ELSE J = MERG_REC.TOPIC2(I) + 1;                      2650.
 85   1  2              T_N(3) = T_N(3) + 1;                                      2660.
 86   1  2              T_N(K) = T_N(K) + 1;                                      2670.
 87   1  2              TWGT_SUM(3) = TWGT_SUM(3) + WGTS(2,J,I);                  2680.
 88   1  2              TWGT_SUM(K) = TWGT_SUM(K) + WGTS(2,J,I);                  2690.
 89   1  2              K = K + 1;                                                2700.
 90   1  2              IF K > 2 THEN K = 1;                                      2710.
 91   1  2          END;                                                          2720.
 92   1  1      END;                                                              2730.
               /* PROCESS ITEMS 3A AND 3B AS ONE RESPONSE                   */    2740.
 93   1  0      IF MERG_REC.TOPIC2(11) = 9 & MERG_REC.TOPIC2(12) = 9              2750.
                  THEN GO TO FINISH_TOPIC2;                                       2760.
 94   1  0      T_N(3) = T_N(3) + 1;                                              2770.
 95   1  0      T_N(K) = T_N(K) + 1;                                              2780.
 96   1  0      IF SUBSTR(TOPIC2_STR,11,2) = '11' | SUBSTR(TOPIC2_STR,11,2) = '01'  2790.
                  THEN GO TO FINISH_TOPIC2;                                       2800.
                  /* YES,YES AND NO,YES = WGT OF ZERO                       */    2810.
 97   1  0      IF SUBSTR(TOPIC2_STR,11,2) = '10' THEN DO;                        2820.
 98   1  1          TWGT_SUM(3) = TWGT_SUM(3) + 1;                                2830.
 99   1  1          TWGT_SUM(K) = TWGT_SUM(K) + 1;                                2840.
100   1  1          GO TO FINISH_TOPIC2;                                          2850.
101   1  1          END;                                                          2860.
102   1  0      IF SUBSTR(TOPIC2_STR,11,2) = '00' THEN DO;                        2870.
103   1  1          TWGT_SUM(3) = TWGT_SUM(3) + 3;                                2880.
104   1  1          TWGT_SUM(K) = TWGT_SUM(K) + 3;                                2890.
105   1  1          GO TO FINISH_TOPIC2;                                          2900.
106   1  1          END;                                                          2910.
                                                                                  2920.
107   1  0  FINISH_TOPIC2:                                                       2930.
               DO I = 1 TO 9;                                                     2940.
108   1  1          IF T_N(I) > 0 THEN DO;                                        2950.
109   1  2              T_SCORE(I) = ((TWGT_SUM(I)/T_N(I)) + .005) * 1000;        2960.
110   1  2          END;                                                          2970.
111   1  1          ELSE T_SCORE(I) = 9999999;                                    2980.
```

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112   1  1          WGT_SUM(2,I) = TWGT_SUM(I);                                    2990.
113   1  1          N(2,I)       = T_N(I);                                         3000.
114   1  1          SCORE(2,I)   = T_SCORE(I);                                     3010.
115   1  1          TWGT_SUM(I)  = 0;                                              3020.
116   1  1          T_N(I)       = 0;                                              3030.
117   1  1          T_SCORE(I)   = 0;                                              3040.
118   1  1      END;                                                               3050.
                                                                                  3060.
            /* PROCESS TOPIC3 - ADMISSIONS POLICIES                      */      3070.
119   1  0      K = 1;          /* SPLIT HALF INDICATOR                          */ 3080.
120   1  0      DO I = 1,2,3,4,5,6,7,8,10,11,12;   /* PROCESS ITEMS 1A-6C EXCEPT*/ 3090.
                                                   /* DON'T PROCESS 5A          */ 3100.
121   1  1          IF MERG_REC.TOPIC3(I) ^= 9 THEN DO;                            3110.
122   1  2              IF MERG_REC.TOPIC3(I) = 8 THEN J = 3;                      3120.
123   1  2                  ELSE J = MERG_REC.TOPIC3(I) + 1;                       3130.
124   1  2              T_N(3) = T_N(3) + 1;                                       3140.
125   1  2              T_N(K) = T_N(K) + 1;                                       3150.
126   1  2              TWGT_SUM(3) = TWGT_SUM(3) + WGTS(3,J,1);                   3160.
127   1  2              TWGT_SUM(K) = TWGT_SUM(K) + WGTS(3,J,1);                   3170.
128   1  2              K = K + 1;                                                 3180.
129   1  2              IF K > 2 THEN K = 1;                                       3190.
130   1  2          END;                                                           3200.
131   1  1      END;                                                               3210.
                                                                                  3220.
            /*  FINISH TOPIC3          */                                        3230.
                                                                                  3240.
132   1  0      DO I = 1 TO 3;                                                     3250.
133   1  1          IF T_N(I) > 0 THEN DO;                                         3260.
134   1  2              T_SCORE(I) = ((TWGT_SUM(I)/T_N(I)) + .005) * 10000;        3270.
135   1  2          END;                                                           3280.
136   1  1          ELSE T_SCORE(I) = 9999999;                                     3290.
137   1  1          WGT_SUM(3,I) = TWGT_SUM(I);                                    3300.
138   1  1          N(3,I)       = T_N(I);                                         3310.
139   1  1          SCORE(3,I)   = T_SCORE(I);                                     3320.
140   1  1          TWGT_SUM(I)  = 0;                                              3330.
141   1  1          T_N(I)       = 0;                                              3340.
142   1  1          T_SCORE(I)   = 0;                                              3350.
143   1  1      END;                                                               3360.
                                                                                  3370.
            /*  PROCESS TOPIC4 - INSTRUCTIONAL STAFF                      */      3380.
144   1  0      K = 1;                          /* SPLIT HALF INDICATOR          */ 3390.
            /* COUNT NO'S IF 2A,2B,2D,2F                                        */ 3400.
145   1  0      L = 0;                          /* WHERE L IS NUMBER OF NO'S     */ 3410.
146   1  0      DO I = 1,2,4,5;                                                    3420.
147   1  1          IF MERG_REC.TOPIC4(I) = 0 THEN L = L + 1;                      3430.
148   1  1      END;                                                               3440.
            /* PROCESS 1A- 4D EXCEPT 2A,2B,2D,AND 2F                            */ 3450.
            /* ALSO SKIP 2F WHICH IS NOT WEIGHTED                               */ 3460.
149   1  0      DO I = 1,4,6,9,10,11,12;                                           3470.
15    1  1          IF MERG_REC.TOPIC4(I) ^= 9 THEN DO;
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/*   IWEIGHT - WEIGHT THE ITEMS ON THE IRF'S TO GET TOPIC SCORES   */

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                    IF MERG_REC.TOPIC4(I) = 8 THEN J = 3;                          3480.
                       ELSE J = MERG_REC.TOPIC4(I) + 1;                            3490.
                    T_N(3) = T_N(3) + 1;                                           3500.
                    T_N(K) = T_N(K) + 1;                                           3510.
                    TWGT_SUM(3) = TWGT_SUM(3) + WGTS(4,J,I);                       3520.
                    TWGT_SUM(K) = TWGT_SUM(K) + WGTS(4,J,I);                       3530.
                    K = K + 1;                                                     3540.
                    IF K > 2 THEN K = 1;                                           3550.
                END;                                                               3560.
            END;                                                                   3570.
            /* WEIGHT ITEMS 2A,2B,2D,AND 2E AS ONE ITEM                    */     3580.
            IF SUBSTR(TOPIC4_STR,2,2) = '99' & SUBSTR(TOPIC4_STR,5,2) = '99'
                THEN GO TO FINISH_TOPIC4;                                          3590.
                                                                                   3600.
            T_N(3) = T_N(3) + 1;                                                   3610.
            T_N(K) = T_N(K) + 1;                                                   3620.
            IF I < 4 THEN GO TO FINISH_TOPIC4;      /* WEIGHT IS ZERO          */ 3630.
            TWGT_SUM(3) = TWGT_SUM(3) + (L - 2);                                   3640.
            TWGT_SUM(K) = TWGT_SUM(K) + (L - 2);                                   3650.
                                                                                   3660.
        FINISH_TOPIC4:                                                             3670.
            DO I = 1 TO 3;                                                         3680.
                IF T_N(I) > 0 THEN DO;                                             3690.
                    T_SCORE(I) = FIX(TWGT_SUM(I)/T_N(I)) + .005) * 1000;           3700.
                END;                                                               3710.
                ELSE T_SCORE(I) = 999999;                                          3720.
                WGT_SUM(4,I) = TWGT_SUM(I);                                        3730.
                N(4,I) = T_N(I);                                                   3740.
                SCORE(4,I) = T_SCORE(I);                                           3750.
                TWGT_SUM(I) = 0;                                                   3760.
                T_N(I) = 0;                                                        3770.
                T_SCORE(I) = 0;                                                    3780.
            END;                                                                   3790.
                                                                                   3800.
        /*  PROCESS TOPICS - WRITTEN DISCLOSURE                         */     3810.
            K = 1;                          /* SPLIT HALF INDICATION       */ 3820.
            /* PROCESS ITEMS 1A - 1Y                                      */     3830.
            DO I = 1 TO 25;                                                        3840.
                IF MERG_REC.TOPIC5(I) ^= 9 THEN DO;                                3850.
                    T_N(3) = T_N(3) + 1;                                           3860.
                    T_N(K) = T_N(K) + 1;                                           3870.
                    IF MERG_REC.TOPIC5(I) = 0 THEN DO;                             3880.
                        TWGT_SUM(3) = TWGT_SUM(3) + .5;                            3890.
                        TWGT_SUM(K) = TWGT_SUM(K) + .5;                            3900.
                    END;                                                           3910.
                    K = K + 1;                                                     3920.
                    IF K > 2 THEN K = 1;                                           3930.
                END;                                                               3940.
            END;                                                                   3950.
            /* PROCESS ITEMS 2A - 4A EXCEPT 3A AND 5A WHICH AREN'T WEIGHTED */    3960.
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/*   IWEIGHT - WEIGHT THE ITEMS ON THE IRF'S TO GET TOPIC SCORES     */
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                                                                                3970.
192   1  0     DO I = 1,2,3,4,5,6,7,8,9,10,12;                                  3980.
193   1  1       IF MERG_REC.TOPICS(I + 25) ¬= 9 THEN DO;                       3990.
194   1  2         IF MERG_REC.TOPICS(I + 25) = 8 THEN J = 3;                   4000.
195   1  2           ELSE J = MERG_REC.TOPICS(I+25) + 1;                        4010.
196   1  2         T_N(3) = T_N(3) + 1;                                         4020.
197   1  2         T_N(K) = T_N(K) + 1;                                         4030.
198   1  2         TWGT_SUM(3) = TWGT_SUM(3) + WGTS(5,J,I);                     4040.
199   1  2         TWGT_SUM(K) = TWGT_SUM(K) + WGTS(5,J,I);                     4050.
200   1  2         K = K + 1;                                                   4060.
201   1  2         IF K > 2 THEN K = 1;                                         4070.
202   1  2       END;                                                           4080.
203   1  1     END;                                                             4090.
                                                                          */    4100.
              /* PROCESS ITEMS 6A - 6G                                        4110.
204   1  0     DO I = 1 TO 7;                                                   4120.
205   1  1       IF MERG_REC.TOPICS(38 + I) ¬= 9 THEN DO;                       4130.
206   1  2         T_N(3) = T_N(3) + 1;                                         4140.
207   1  2         T_N(K) = T_N(K) + 1;                                         4150.
208   1  2         IF MERG_REC.TOPICS(38+I) = 0 THEN DO;                        4160.
209   1  3           TWGT_SUM(3) = TWGT_SUM(3) + 1;                             4170.
210   1  3           TWGT_SUM(K) = TWGT_SUM(K) + 1;                             4180.
211   1  3         END;                                                         4190.
212   1  2         K = K + 1;                                                   4200.
213   1  2         IF K > 2 THEN K = 1;                                         4210.
214   1  2       END;                                                           4220.
215   1  1     END;                                                             4230.
                                                                               4240.
            /*   FINISH TOPICS                */                              4250.
216   1  0     DO I = 1 TO 3;                                                   4260.
217   1  1       IF T_N(I) > 0 THEN DO;                                         4270.
218   1  2         T_SCORE(I) = ((TWGT_SUM(I)/T_N(I)) + .005) * 1000;           4280.
219   1  2       END;                                                           4290.
220   1  1       ELSE T_SCORE(I) = 999999;                                      4300.
221   1  1       WGT_SUM(5,I) = TWGT_SUM(I);                                    4310.
222   1  1       N(5,I) = T_N(I);                                               4320.
223   1  1       SCORE(5,I) = T_SCORE(I);                                       4330.
224   1  1       TWGT_SUM(I) = 0;                                               4340.
225   1  1       T_N(I) = 0;                                                    4350.
226   1  1       T_SCORE(I) = 0;                                                4360.
227   1  1     END;                                                             4370.
            /*  PROCESS TOPIC6 - STUDENT ORIENTATION                    */     4380.
                                        /* SPLIT HALF INDICATOR          */   4390.
228   1  0     K = 1;                                                           4400.
              /* PROCESS ITEMS 1A - 2D                                        4410.
229   1  0     DO I = 1 TO 5;                                                   4420.
230   1  1       IF MERG_REC.TOPIC6(I) ¬= 9 THEN DO;                            4430.
231   1  2         IF MERG_REC.TOPIC6(I) = 8 THEN J = 3;                        4440.
232   1  2           ELSE J = MERG_REC.TOPIC6(I) + 1;                           4450.
233   1  2         T_N(3) = T_N(3) + 1;
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                        T_N(K) = T_N(K) + 1;                                        4460.
                        TWGT_SUM(3) = TWGT_SUM(3) + WGTS(6,J,I);                    4470.
                        TWGT_SUM(K) = TWGT_SUM(K) + WGTS(6,J,I);                    4480.
                        K = K + 1;                                                  4490.
                        IF K > 2 THEN K = 1;                                        4500.
                    END;                                                            4510.
                END;                                                                4520.
                                                                                    4530.
            /*  FINISH TOPIC6                */                                     4540.
            DO I = 1 TO 3;                                                          4550.
                IF T_N(I) > 0 THEN DO;                                              4560.
                    T_SCORE(I) = ((TWGT_SUM(I)/T_N(I)) + .005) * 1000;              4570.
                END;                                                                4580.
                ELSE T_SCORE(I) = 999999;                                           4590.
                WGT_SUM(6,I) = TWGT_SUM(I);                                         4600.
                N(6,I) = T_N(I);                                                    4610.
                SCORE(6,I) = T_SCORE(I);                                            4620.
                TWGT_SUM(I) = 0;                                                    4630.
                T_N(I) = 0;                                                         4640.
                T_SCORE(I) = 0;                                                     4650.
            END;                                                                    4660.
                                                                                    4670.
            /*  PROCESS TOPIC7 - JOB PLACEMENT AND FOLLOWUP                */      4680.
            K = 1;                          /* SPLIT HALF INDICATOR          */   4690.
            /* PROCESS ITEMS 1A - 3C EXCEPT 1A AND 2H                         */   4700.
            DO I = 2,3,4,5,6,7,8,10,11,12;                                          4710.
                IF MERG_REC.TOPIC7(I) ^= 9 THEN DO;                                 4720.
                    IF MERG_REC.TOPIC7(I) = 8 THEN J = 3;                           4730.
                        ELSE J = MERG_REC.TOPIC7(I) + 1;                            4740.
                    T_N(3) = T_N(3) + 1;                                            4750.
                    T_N(K) = T_N(K) + 1;                                            4760.
                    TWGT_SUM(3) = TWGT_SUM(3) + WGTS(7,J,I);                        4770.
                    TWGT_SUM(K) = TWGT_SUM(K) + WGTS(7,J,I);                        4780.
                    K = K + 1;                                                      4790.
                    IF K > 2 THEN K = 1;                                            4800.
                END;                                                                4810.
            END;                                                                    4820.
            /* PROCESS ITEMS 4A AND 4B AS ONE RESPONSE                        */   4830.
            IF MERG_REC.TOPIC7(13) = 9 & MERG_REC.TOPIC7(14) = 9                    4840.
                THEN GO TO FINISH_TOPIC7;                                           4850.
            T_N(3) = T_N(3) + 1;                                                    4860.
            T_N(K) = T_N(K) + 1;                                                    4870.
            IF SUBSTR(TOPIC7_STR,13,2) = '11' | SUBSTR(TOPIC7_STR,13,2) = '01'      4880.
                THEN GO TO FINISH_TOPIC7;                                           4890.
                /* YES,YES AND NO,YES HAVE A WEIGHT OF ZERO                   */   4900.
            IF SUBSTR(TOPIC7_STR,13,2) = '00' THEN DO;                              4910.
                TWGT_SUM(3) = TWGT_SUM(3) + 2;                                      4920.
                TWGT_SUM(K) = TWGT_SUM(K) + 2;                                      4930.
                GO TO FINISH_TOPIC7;                                                4940.
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274   1  1          END;                                                    4950.
275   1  0       IF SUBSTR(TOPIC7_STR,13,2) = '10' THEN DO;                4960.
276   1  1          TWGT_SUM(3) = TWGT_SUM(3) + 1;                         4970.
277   1  1          TWGT_SUM(K) = TWGT_SUM(K) + 1;                         4980.
278   1  1          GO TO FINISH_TOPIC7;                                   4990.
279   1  1          END;                                                   5000.
                                                                          5010.
280   1  0    FINISH_TOPIC7:                                             5020.
               DO I = 1 TO 3;                                             5030.
281   1  1          IF T_N(I) > 0 THEN DO;                                 5040.
282   1  2             T_SCORE(I) = ((TWGT_SUM(I)/T_N(I)) + .005) * 1000; 5050.
283   1  2          END;                                                   5060.
284   1  1          ELSE T_SCORE(I) = 999999;                              5070.
285   1  1          WGT_SUM(7,I) = TWGT_SUM(I);                            5080.
286   1  1          N(7,I)       = T_N(I);                                 5090.
287   1  1          SCORE(7,I)   = T_SCORE(I);                             5100.
288   1  1          TWGT_SUM(I)  = 0;                                      5110.
289   1  1          T_N(I)       = 0;                                      5120.
290   1  1          T_SCORE(I)   = 0;                                      5130.
291   1  1       END;                                                      5140.
                                                                          5150.
               /* PROCESS TOPIC8 - RECORDKEEPING PRACTISES          */     5160.
292   1  0       K = 1;                    /* SPLIT HALF INDICATOR      */ 5170.
               /* PROCESS ALL ITEMS EXCEPT IF WHICH ISN'T WEIGHTED    */ 5180.
293   1  0       DO I = 1,2,3,4,5,7;                                       5190.
294   1  1          IF MERG_REC.TOPICA(I) ^= 9 THEN DO;                    5200.
295   1  2             IF MERG_REC.TOPICA(I) = 8 THEN J = 3;               5210.
296   1  2                ELSE J = MERG_REC.TOPICA(I) + 1;                 5220.
297   1  2             T_N(3) = T_N(3) + 1;                               5230.
298   1  2             T_N(K) = T_N(K) + 1;                               5240.
299   1  2             TWGT_SUM(3) = TWGT_SUM(3) + WGTS(8,J,I);           5250.
300   1  2             TWGT_SUM(K) = TWGT_SUM(K) + WGTS(8,J,I);           5260.
301   1  2             K = K + 1;                                         5270.
302   1  2             IF K > 2 THEN K = 1;                               5280.
303   1  2          END;                                                  5290.
304   1  1       END;                                                     5300.
                                                                          5310.
               /*   FINISH TOPIC8          */                           5320.
305   1  0       DO I = 1 TO 3;                                           5330.
306   1  1          IF T_N(I) > 0 THEN DO;                                 5340.
307   1  2             T_SCORE(I) = ((TWGT_SUM(I)/T_N(I)) + .005) * 1000; 5350.
308   1  2          END;                                                   5360.
309   1  1          ELSE T_SCORE(I) = 999999;                              5370.
310   1  1          WGT_SUM(8,I) = TWGT_SUM(I);                            5380.
311   1  1          N(8,I)       = T_N(I);                                 5390.
312   1  1          SCORE(8,I)   = T_SCORE(I);                             5400.
313   1  1          TWGT_SUM(I)  = 0;                                      5410.
314   1  1          T_N(I)       = 0;                                      5420.
315   1  1          T_SCORE(I)   = 0;                                      5430.
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 316   1  1     END;                                                                    5440.
                                                                                      5450.
              /*  PROCESS TOPIC9 - STAFF STABILITY                          */        5460.
 317   1  0     K = 1;                        /* SPLIT HALF INDICATOR              */ 5470.
              /* PROCESS 2A - 1A IS NOT WEIGHTED                            */        5480.
 318   1  0     IF SUBSTR(TOPIC9_STR,4,3) = '999' THEN;      /* MISSING DATA  */      5490.
 319   1  0          ELSE DO;                                                         5500.
 320   1  1               T_N(3) = T_N(3) + 1;                                        5510.
 321   1  1               T_N(K) = T_N(K) + 1;                                        5520.
 322   1  1               IF SUBSTR(TOPIC9_STR,4,3) = '000' THEN J = 0;               5530.
 323   1  1                    ELSE IF SUBSTR(TOPIC9_STR,4,3) < '002' THEN J = 1;     5540.
 324   1  1                    ELSE IF SUBSTR(TOPIC9_STR,4,3) < '005' THEN J = 2;     5550.
 325   1  1                    ELSE J = 3;                                            5560.
 326   1  1               TWGT_SUM(3) = TWGT_SUM(3) + J;                              5570.
 327   1  1               TWGT_SUM(K) = TWGT_SUM(K) + J;                              5580.
 328   1  1               K = K + 1;                                                  5590.
 329   1  1               IF K > 2 THEN K = 1;                                        5600.
 330   1  1          END;                                                             5610.
                                                                                      5620.
              /* PROCESS ITEM 3A                                                */ 5630.
 331   1  0     IF MERG_REC.TOPIC9(7) = 9 THEN GO TO FINISH_TOPIC9;                   5640.
 332   1  0     T_N(3) = T_N(3) + 1;                                                  5650.
 333   1  0     T_N(K) = T_N(K) + 1;                                                  5660.
 334   1  0     IF MERG_REC.TOPIC9(7) = 8 | MERG_REC.TOPIC9(7) = 0 THEN J = 0;        5670.
 335   1  0          ELSE J = 2;                                                      5680.
 336   1  0     TWGT_SUM(3) = TWGT_SUM(3) + J;                                        5690.
 337   1  0     TWGT_SUM(K) = TWGT_SUM(K) + J;                                        5700.
                                                                                      5710.
 338   1  0   FINISH_TOPIC9:                                                         5720.
              DO I = 1 TO 3;                                                          5730.
 339   1  1          IF T_N(I) > 2 THEN DO;                                          5740.
 340   1  2               T_SCORE(I) = ((TWGT_SUM(I)/T_N(I)) + .005) * 1000;         5750.
 341   1  2          END;                                                            5760.
 342   1  1          ELSE T_SCORE(I) = 999999;                                       5770.
 343   1  1          WGT_SUM(9,I) = TWGT_SUM(I);                                     5780.
 344   1  1          N(9,I)       = T_N(I);                                          5790.
 345   1  1          SCORE(9,I)   = T_SCORE(I);                                      5800.
 346   1  1          TWGT_SUM(I)  = 0;                                               5810.
 347   1  1          T_N(I)       = 0;                                               5820.
 348   1  1          T_SCORE(I)   = 0;                                               5830.
 349   1  1     END;                                                                 5840.
              /*  PROCESS TOPIC10 - STATUS REPRESENTATION                    */     5850.
 350   1  0     K = 1;                        /* SPLIT HALF INDICATOR              */ 5860.
 351   1  0     DO I = 1 TO 61;                                                      5870.
 352   1  1          IF MERG_REC.TOPIC10(I) ¬= 9 THEN DO;                            5880.
 353   1  2               IF MERG_REC.TOPIC10(I) = 8 THEN J = 3;                     5890.
 354   1  2                    ELSE J = MERG_REC.TOPIC10(I) + 1;                     5900.
 355   1  2               T_N(3) = T_N(3) + 1;                                       5910.
 356   1  2               T_N(K) = T_N(K) + 1;                                       5920.
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                        TWGT_SUM(3) = TWGT_SUM(3) + WGTS(10*J+I);                5930.
                        TWGT_SUM(K) = TWGT_SUM(K) + WGTS(10*J+I);                5940.
                                                                                 5950.
                        K = K + 1;                                               5960.
                        IF K > 2 THEN K = 1;                                     5970.
                    END;                                                         5980.
                END;                                                             5990.
                                                                                 6000.
            /* FINISH TOPIC10          */                                       6010.
            DO I = 1 TO 5;                                                       6020.
                IF T_N(I) > 0 THEN DO;                                           6030.
                    T_SCORE(I) = ((TWGT_SUM(I)/T_N(I)) + .005) * 1000;           6040.
                END;                                                             6050.
                ELSE T_SCORE(I) = 9999999;                                       6060.
                WGT_SUM(10*I) = TWGT_SUM(I);                                     6070.
                N(10*I)       = T_N(I);                                          6080.
                SCORE(10*I)   = T_SCORE(I);                                      6090.
                TWGT_SUM(I)   = 0;                                               6100.
                T_N(I)        = 0;                                               6110.
                T_SCORE(I)    = 0;                                               6120.
            END;                                                                 6130.
        /* PROCESS TOPIC11 - FINANCIAL STABILITY                        */
            K = 1;                              /* SPLIT HALF INDICATOR      */ 6140.
        /* PROCESS ITEMS 1A AND 1H AS ONE RESPONSE                      */ 6150.
            IF MERG_REC.TOPIC11(1) = 9 & MERG_REC.TOPIC11(2) = 9 THEN;           6160.
                ELSE DO;                                                         6170.
                    T_N(3) = T_N(3) + 1;                                         6180.
                    T_N(K) = T_N(K) + 1;                                         6190.
                    IF SUBSTR(TOPIC11_STR,1,2) = '11' |                          6200.
                       SUBSTR(TOPIC11_STR,1,2) = '01' THEN J = 0;                6210.
                    ELSE IF SUBSTR(TOPIC11_STR,1,2) = '10' THEN J = 1;           6220.
                    ELSE J = 2;                                                  6230.
                    TWGT_SUM(3) = TWGT_SUM(3) + J;                               6240.
                    TWGT_SUM(K) = TWGT_SUM(K) + J;                               6250.
                    K = K + 1;                                                   6260.
                    IF K > 2 THEN K = 1;                                         6270.
                END;                                                             6280.
                                                                                 6290.
        /* PROCESS ITEMS 1C AND 1D AS ONE RESPONSE                      */ 6300.
            IF MERG_REC.TOPIC11(3) = 9 & MERG_REC.TOPIC11(4) = 9 THEN;           6310.
                ELSE DO;                                                         6320.
                    T_N(3) = T_N(3) + 1;                                         6330.
                    T_N(K) = T_N(K) + 1;                                         6340.
                    IF SUBSTR(TOPIC11_STR,3,2) = '11' |                          6350.
                       SUBSTR(TOPIC11_STR,3,2) = '01' THEN J = 0;                6360.
                    ELSE IF SUBSTR(TOPIC11_STR,3,2) = '10' THEN J = 1;           6370.
                    ELSE J = 2;                                                  6380.
                    TWGT_SUM(3) = TWGT_SUM(3) + J;                               6390.
                    TWGT_SUM(K) = TWGT_SUM(K) + J;                               6400.
                    K = K + 1;                                                   6410.
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STMT LEV NT

                        IF K > 2 THEN K = 1;                                    6420.
                    END;                                                        6430.
                                                                                6440.
                /* PROCESS ITEMS 2A - 6B EXCEPT 2A                          */ 6450.
                DO I = 2 TO 4;                                                  6460.
                    IF MERG_REC.TOPIC11(4*I) ^= 9 THEN DO;                      6470.
                        IF MERG_REC.TOPIC11(4*I) = 8 THEN J = 3;                6480.
                            ELSE J = MERG_REC.TOPIC11(4*I) + 1;                 6490.
                        T_N(3) = T_N(3) + 1;                                    6500.
                        T_N(K) = T_N(K) + 1;                                    6510.
                        TWGT_SUM(3) = TWGT_SUM(3) + WGTS(11*J+I);               6520.
                        TWGT_SUM(K) = TWGT_SUM(K) + WGTS(11*J+I);               6530.
                        K = K + 1;                                              6540.
                        IF K > 2 THEN K = 1;                                    6550.
                    END;                                                        6560.
                END;                                                            6570.
                                                                                6580.
                /* FINISH TOPIC11                                           */ 6590.
                DO I = 1 TO 3;                                                  6600.
                    IF T_N(I) > 0 THEN DO;                                      6610.
                        T_SCORE(I) = ((TWGT_SUM(I)/T_N(I)) + .005) * 1000;      6620.
                    END;                                                        6630.
                    ELSE T_SCORE(I) = 999999;                                   6640.
                    WGT_SUM(11*I) = TWGT_SUM(I);                                6650.
                    N(11*I)       = T_N(I);                                     6660.
                    SCORE(11*I)   = T_SCORE(I);                                 6670.
                    TWGT_SUM(I)   = 0;                                          6680.
                    T_N(I)        = 0;                                          6690.
                    T_SCORE(I)    = 0;                                          6700.
                END;                                                            6710.
                                                                                6720.
                                                                                6730.
                /* PROCESS TOPIC12 - INSTRUCTIONAL PROGRAMS                 */ 6740.
                K = 1;                          /* SPLIT HALF INDICATOR     */ 6750.
                /* PROCESS 1A AND 1H AS ONE RESPONSE                        */ 6760.
                IF SUBSTR(TOPIC12_STR,1,2) = '99' THEN;                         6770.
                    ELSE DO;                                                    6780.
                        T_N(3) = T_N(3) + 1;                                    6790.
                        T_N(K) = T_N(K) + 1;                                    6800.
                        IF SUBSTR(TOPIC12_STR,1,2) = '11' |                     6810.
                           SUBSTR(TOPIC12_STR,1,2) = '01' THEN J = 0;           6820.
                        ELSE IF SUBSTR(TOPIC12_STR,1,2) = '10' THEN J = 1;      6830.
                        ELSE J = 3;                                             6840.
                        TWGT_SUM(3) = TWGT_SUM(3) + J;                          6850.
                        TWGT_SUM(K) = TWGT_SUM(K) + J;                          6860.
                        K = K + 1;                                              6870.
                        IF K > 2 THEN K = 1;                                    6880.
                    END;                                                        6890.
                                                                                6900.
```

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STMT LEV NI

                    /* PROCESS ITEMS 2A AND 2B AS ONE RESPONSE                    */  6910.
     437   1  0      IF SUBSTR(TOPIC12_STR,3,2) = '99' THEN                           6920.
     438   1  0          ELSE DO;                                                     6930.
     439   1  1              T_N(3) = T_N(3) + 1;                                     6940.
     440   1  1              T_N(K) = T_N(K) + 1;                                     6950.
     441   1  1              IF SUBSTR(TOPIC12_STR,3,2) = '11' |                      6960.
                                SUBSTR(TOPIC12_STR,3,2) = '01' THEN J = 0;          6970.
     442   1  1              ELSE IF SUBSTR(TOPIC12_STR,3,2) = '10' THEN J = 1;      6980.
     443   1  1              ELSE J = 2;                                              6990.
     444   1  1              TWGT_SUM(3) = TWGT_SUM(3) + J;                           7000.
     445   1  1              TWGT_SUM(K) = TWGT_SUM(K) + J;                           7010.
     446   1  1              K = K + 1;                                               7020.
     447   1  1              IF K > 2 THEN K = 1;                                     7030.
     448   1  1          END;                                                         7040.
                                                                                     7050.
                    /* PROCESS ITEMS 3A - 8A                                      */  7060.
     449   1  0      DO I = 1 TO 41;                                                  7070.
     450   1  1          IF MERG_REC.TOPIC12(I+4) ^= 9 THEN DO;                       7080.
     451   1  2              IF MERG_REC.TOPIC12(I+4) = 8 THEN J = 3;                 7090.
     452   1  2                  ELSE J = MERG_REC.TOPIC12(I+4) + 1;                  7100.
     453   1  2              T_N(3) = T_N(3) + 1;                                     7110.
     454   1  2              T_N(K) = T_N(K) + 1;                                     7120.
     455   1  2              TWGT_SUM(3) = TWGT_SUM(3) + WGTS(12,J,I);                7130.
     456   1  2              TWGT_SUM(K) = TWGT_SUM(K) + WGTS(12,J,I);                7140.
     457   1  2              K = K + 1;                                               7150.
     458   1  2              IF K > 2 THEN K = 1;                                     7160.
     459   1  2          END;                                                         7170.
     460   1  1      END;                                                             7180.
                                                                                     7190.
                /* FINISH TOPIC12                                                 */  7200.
     461   1  0      DO I = 1 TO 3;                                                   7210.
     462   1  1          IF T_N(I) > 0 THEN DO;                                       7220.
     463   1  2              T_SCORE(I) = ((TWGT_SUM(I)/T_N(I)) + .005) * 100;        7230.
     464   1  2          END;                                                         7240.
     465   1  1          ELSE T_SCORE(I) = 999999;                                    7250.
     466   1  1          WGT_SUM(12,I) = TWGT_SUM(I);                                 7260.
     467   1  1          N(12,I)       = T_N(I);                                      7270.
     468   1  1          SCORE(12,I)   = T_SCORE(I);                                  7280.
     469   1  1          TWGT_SUM(I)   = 0;                                           7290.
     470   1  1          T_N(I)        = 0;                                           7300.
     471   1  1          T_SCORE(I)    = 0;                                           7310.
     472   1  1      END;                                                             7320.
                                                                                     7330.
                /* PROCESS_TOPIC13 - INSTRUCTIONAL FACILITIES                 */  7340.
     473   1  0      K = 1;                          /* SPLIT HALF INDICATOR       */  7350.
                    /* PROCESS 1A,3A AND 3B                                       */  7360.
     474   1  0      DO I = 1,4,5;                                                    7370.
     475   1  1          IF MERG_REC.TOPIC13(I) ^= 9 THEN DO;                         7380.
     476   1  2              IF MERG_REC.TOPIC13(I) = 8 THEN J = 3;                   7390.
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STMT LEV NT

477   1  2                    ELSE J = MERG_REC.TOPIC13(I) + 1;                    7400.
478   1  2                T_N(3) = T_N(3) + 1;                                     7410.
479   1  2                T_N(K) = T_N(K) + 1;                                     7420.
480   1  2                TWGT_SUM(3) = TWGT_SUM(3) + WGTS(13,J,I);                7430.
481   1  2                TWGT_SUM(K) = TWGT_SUM(K) + WGTS(13,J,I);                7440.
482   1  2                K = K + 1;                                               7450.
483   1  2                IF K > 2 THEN K = 1;                                     7460.
484   1  2             END;                                                        7470.
485   1  1          END;                                                          7480.
                                                                                 7490.
                   /* PROCESS ITEMS 2A AND 2B AS ONE RESPONSE                */ 7500.
486   1  0          IF SUBSTR(TOPIC13_STR,2,2) = '99' THEN;                       7510.
487   1  0             ELSE DO;                                                   7520.
488   1  1                T_N(3) = T_N(3) + 1;                                     7530.
489   1  1                T_N(K) = T_N(K) + 1;                                     7540.
490   1  1                IF SUBSTR(TOPIC13_STR,2,2) = '11' |                      7550.
                              SUBSTR(TOPIC13_STR,2,2) = '01' THEN J = 0;         7560.
491   1  1                ELSE IF SUBSTR(TOPIC13_STR,2,2) = '10' THEN J = 1;     7570.
492   1  1                ELSE J = 2;                                              7580.
493   1  1                TWGT_SUM(3) = TWGT_SUM(3) + J;                           7590.
494   1  1                TWGT_SUM(K) = TWGT_SUM(K) + J;                           7600.
495   1  1             END;                                                        7610.
                                                                                 7620.
                   /* FINISH TOPIC13          */                                7630.
496   1  0          DO I = 1 TO 78;                                               7640.
497   1  1             IF T_N(I) > 0 THEN DO;                                     7650.
498   1  2                T_SCORE(I) = ((TWGT_SUM(I)/T_N(I)) * .005) * 1000;      7660.
499   1  2             END;                                                        7670.
500   1  1             ELSE T_SCORE(I) = 999999;                                  7680.
501   1  1             WGT_SUM(13,I)   = TWGT_SUM(I);                             7690.
502   1  1             N(13,I)         = T_N(I);                                  7700.
503   1  1             SCORE(13,I)     = T_SCORE(I);                              7710.
504   1  1             TWGT_SUM(I)     = 0;                                       7720.
505   1  1             T_N(I)          = 0;                                       7730.
506   1  1             T_SCORE(I)      = 0;                                       7740.
507   1  1          END;                                                          7750.
                                                                                 7760.
                   /* DEVELOP IRF SCORES   */                                    7770.
508   1  0          DO I = 1 TO 13;                                               7780.
509   1  1             IRF_WGT_SUM = IRF_WGT_SUM + WGT_SUM(I,3);                  7790.
510   1  1             IRFA_WGT_SUM = IRFA_WGT_SUM + WGT_SUM(I,1);                7800.
511   1  1             IRFB_WGT_SUM = IRFB_WGT_SUM + WGT_SUM(I,2);                7810.
512   1  1             IRF_N = IRF_N + N(I,3);                                    7820.
513   1  1             IRFA_N = IRFA_N + N(I,1);                                  7830.
514   1  1             IRFB_N = IRFB_N + N(I,2);                                  7840.
515   1  1          END;                                                          7850.
516   1  0          IF IRF_N > 0 THEN DO;                                         7860.
517   1  1             IRF_SCORE = ((IRF_WGT_SUM/IRF_N) * .005) * 1000;           7870.
518   1  1          END;                                                          7880.
```

```
IWEIGHT: PROC OPTIONS(MAIN);

519   1  0     ELSE IRF_SCORE = 9999999;                                    7890.
520   1  0     IF IRFA_N > 0 THEN DO;                                       7900.
521   1  1        IRFA_SCORE = ((IRFA_WGT_SUM/IRFA_N) + .005) * 10000;      7910.
522   1  1     END;                                                         7920.
523   1  0     ELSE IRFA_SCORE = 9999999;                                   7930.
524   1  0     IF IRFB_N > 0 THEN DO;                                       7940.
525   1  1        IRFB_SCORE = ((IRFB_WGT_SUM/IRFB_N) + .005) * 10000;      7950.
526   1  1     END;                                                         7960.
527   1  0     ELSE IRFB_SCORE = 9999999;                                   7970.
                                                                           7980.
                                                                           7990.
           /* WRITE OUTPUT                                              */ 8000.
528   1  0     WRITE FILE(WGHTDAT) FROM (WGHT_REC);                         8010.
529   1  0     OUT_CNT = OUT_CNT + 1;                                       8020.
530   1  0     PUT SKIP(2);                                                 8030.
531   1  0     PUT DATA(WGHT_REC,MID);                                      8040.
532   1  0     DO I = 1 TO 13;                                              8050.
533   1  1        PUT DATA(SCORE(I,3));                                     8060.
534   1  0     END;                                                         8070.
535   1  0     PUT DATA(IRF_SCORE);                                         8080.
536   1  0     GO TO READ_FRMGDAT;                                          8090.
                                                                           8100.
537   1  0  CLOSE_FILES:                                                   8110.
           CLOSE FILE(MFWGDAT), FILE (WGHTDAT);                            8120.
538   1  0     PUT DATA(IN_CNT);                                            8130.
539   1  0     PUT DATA(OUT_CNT);                                           8140.
540   1  0     PUT SKIP(2) EDIT ('END OF JOB') (X(10),A);                   8150.
541   1  0     END IWEIGHT;                                                 8160.
```

APPENDIX F

Institution Scores for Occupational Institutions
in 37 Institution ICAS Field Test

School Number	Institution Score	Rank
11	90	1
23	140	2
1	150	3
9	170	4.5
20	170	4.5
12	180	6
13	200	7.5
17	200	7.5
14	210	9
22	230	10
21	270	11
34	280	12
30	290	13.5
31	290	13.5
32	300	15
25	320	16
10	340	17.5
37	340	17.5
8	350	19
15	370	20.5
19	370	20.5
5	380	22
33	400	23.5
35	400	23.5
2	430	25

APPENDIX G

Institution Scores for Degree-Granting Institutions
in 37 Institution ICAS Field Test

School Number	Institution Score	Rank
3	110	1.5
26	110	1.5
28	120	3
29	150	4
16	160	5
6	170	6
18	180	7
4	210	8
7	220	9.5
36	220	9.5
24	230	11
27	300	12

APPENDIX H

Suggested Minimum Consumer Protection Standards for Institutions Seeking to Gain or Hold Eligibility for Participating in USOE-Administered Student Assistance Programs

A. Refund Policies and Practices

1. Institution has a written refund policy for fees or charges collected or obligated in advance of enrollment or class attendance.

2. Written refund policy is publicly disseminated to students and prospective students.

3. Written refund policy tells students how to obtain refunds.

4. Written refund policy provides for at least a partial return of student fees or charges based on the amount of instruction the student has had the opportunity to receive.

5. Written refund policy specifies the maximum time allowed between the receipt of a valid refund request and the issuance of a refund.

B. Advertising Practices

1. Institution does not use:

   (a) advertisements in "help wanted" section of newspaper or unselective "talent" contests to stimulate applications for enrollment;

   (b) paid testimonials or endorsements by persons who did not attend the institution; or

   (c) limited time "discounts," to attract enrollees.

2. Advertising of the institution does not guarantee or imply that completion of an education or training program at the institution will lead directly to employment.

3. Institution's advertising does not imply that it:

   (a) has special ties or connections with employers which it does not in fact have;

   (b) offers full or partial scholarships when in fact it offers only loans or deferred tuition;

   (c) has recognized experts on its teaching faculty who in fact have no teaching responsibilities; or

   (d) offers a "superior" educational program when in fact there is no comparative evidence to support the assertion.

C. Admission Practices

1. Institution does not employ admissions representatives whose compensation or salary is dependent wholly or in part on direct commissions based on number of students enrolled.

2. Institution has a written policy governing recruiting and/or admission practices.

3. Written recruiting/admissions policy contains:

   (a) total prohibitions against unethical practices such as the "bait and switch" or the "negative sell";

   (b) a requirement that all prospective students talk to a representative of the institution at the school prior to enrolling; and

   (c) a requirement that all enrollees sign an agreement which describes complete costs, payment requirements, and educational services to be provided by the institution.

4. Institution provides basic remedial instruction for students who are admitted without having met stated admissions requirements.

D. Instructional Staff Evaluation Policies

1. Teaching competence is included as one criterion in formal salary and/or tenure and/or rank review policies.

2. Evaluations of teaching competence include regular, anonymous, objective ratings by students.

E. Disclosure in Written Documents

1. Positive disclosure of the following items in a general catalog, bulletin, other basic information document, or combination of these:

   (a) name and address of school.

   (b) date of publication of the document.

   (c) school calendar including beginning and ending dates of classes and programs, holidays, and other dates of importance.

(d) statement of institutional philosophy, including the educational objectives of any occupational programs offered by the institution.

(e) accurate description of the school's physical facilities.

(f) accurate list of all courses which are actually offered.

(g) indication of when specific, required courses will not be offered.

(h) educational content of each course.

(i) number of hours of instruction in each course and length of time in hours, weeks or months normally required for its completion.

(j) accurate listing of faculty who currently teach.

(k) indication of the distinction between adjunct or part-time faculty and full-time faculty.

(l) policies and procedures regarding acceptability of credits from other institutions.

(m) general acceptability by other institutions of credits earned at this institution.

(n) requirements for graduation.

(o) statement of certificates, diplomas, or degrees awarded upon graduation.

(p) statement of all charges for which a student may be held responsible.

(q) financial aid programs actually available to students.

(r) any standard limitations on eligibility for financial aid programs.

(s) grading system.

(t) policies relating to:

(1) tardiness
(2) absences
(3) make-up work
(4) student conduct
(5) termination
(6) re-entry after termination

(u) any student fee increases in excess of $25 that are planned within the next year.

(v) for student loan applicants:

(1) the effective annual loan interest rate
(2) loan repayment obligations
(3) loan repayment procedures
(4) time allowed for repayment
(5) deferment or cancellation provisions, if any
(6) collection procedures which might be applied in the event of failure to repay

2. In the event any of the following services or facilities are provided, the institution discloses their actual availability and extent:

   (a) job placement assistance or service.

   (b) counseling, including for employment, academic, and/or personal problems.

   (c) dining facilities.

   (d) housing facilities.

   (e) student parking facilities.

3. In the event the institution offers an educational program which leads to the award of degrees (or which results in credits which are transferable toward the award of degrees), it provides accurate descriptions of:

   (a) recognition by a state agency as meeting established educational standards for granting degrees, if there is such an agency;

   (b) the scope and sequence of required courses or subject areas in each degree program; and

   (c) policies and procedures which students must follow to transfer credits within the institution and/or to other institutions.

F. Student Orientation Procedures

1. Institution does conduct a formal orientation program for newly enrolled students.

2. This formal orientation includes at least the following:

   (a) oral presentations or written documents prepared by students who have been previously enrolled at the institution;

   (b) instructions on how and where to voice student complaints and grievances; and

   (c) information on how and where to apply for student financial aid.

G. Job Placement Services and Follow-Through

1. In the event the institution claims to have a job placement service, this service does include at least the following aspects:

   (a) notification of fee charged, if this is the case;

   (b) formal training and supervised practice in job-seeking and job-holding skills;

   (c) contacting prospective employers to develop potential jobs; and

(d) making job interview appointments for individual students, including those seeking part-time employment and recent graduates.

2. In the event the institution claims to offer job placement assistance, the assistance is not confined only to such services as distributing "help wanted" ads from newspapers or referral to a commercial placement service.

3. Institution regularly collects follow-up data on the employment success of former students who did not graduate, recent graduates, and/or longer term graduates.

4. Institution annually calculates the rates of student attrition from each identifiable program or curriculum area and attempts to determine the reasons for this attrition.

H. Recordkeeping Practices

1. Institution maintains the following items in its individual student records:

(a) total fees paid by student;

(b) courses taken and completed;

(c) academic credits, grades earned; and

(d) financial aid amounts granted through the institution, including loans, if any, actually received by student and date of his/her receipt.

2. Institution has a written policy and actual procedures for maintaining individual student access to records for a period of at least two years following his/her departure from the institution, regardless of the operating status of the institution.

I. Turnover of Instructional Staff

1. Every effort is made to avoid replacement of instructors for the same sections/courses, after instruction has begun.

J. Representation of Chartered, Approved, or Accredited Status

1. Institution discloses to students and prospective students the fact(s) of limitation(s) or sanction(s) for noncompliance with designated standards imposed by local, state, or federal government agencies, if any such sanctions exist.

2. The public representations of the institution distinguish between (e.g., list separately, with appropriate explanations) institutional accreditation, specialized or professional program accreditation, state VA-approving agency course approval, and state chartering and licensing, if any are present.

K. Financial Stability

1. If the institution is not publicly-supported, it has the following:

   (a) an endowment or retained earnings fund to pay current operating expenses if they are not covered by student tuition receipts; and

   (b) a reserve of funds sufficient to pay out tuition refunds as students make legitimate requests for them.

2. Institution's financial records and reports are annually subjected to a certified audit.

L. Instructional Programs in Occupational/Professional Preparation Areas

1. Institution maintains and periodically empanels curriculum advisory committees which include representatives of potential employers in <u>each</u> occupational/professional area for which instruction is offered.

2. Institution provides the following, when they are required for employment of graduates in an occupational/professional area:

   (a) specialized/professional program accreditation.

   (b) training in the use of basic tools and equipment.

   (c) internships and/or supervised practice on the job.

   (d) internships and/or supervised practice in simulated job situations.

   (e) instruction on topics necessary for state or professional certification or licensing of graduates.

3. Institution requires at least a biannual review of the relevance and timeliness of occupational/professional curricula.

M. Instructional Equipment and Facilities in Occupational/Professional Preparation Areas

1. Institution maintains and periodically empanels advisory committees on instructional equipment and facilities which include representatives of potential employers in <u>each</u> occupational/professional area for which instruction is offered.

2. Institution annually budgets and expends funds for replacing worn or outdated instructional equipment in each occupational/professional area for which instruction is offered.